PENDING CASE NOTICE: A case is currently pending and in settlement discussions concerning the depreciation rates and return on equity of the subject utility, Nos. ER17-2219, EL17-41 and EL17-93. This complaint should be processed expeditiously for potential consolidation.

NOTICE: Pursuant to the Regulatory Fairness Act, 16 U.S.C. § 824e(b), this Complaint is entitled to the same priority as that provided Section 205 filings of Entergy Services, Inc.

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

LOUISIANA PUBLIC SERVICE	*	
COMMISSION	*	
	*	
VERSUS	*	DOCKET NO. EL18-
	*	
SYSTEM ENERGY RESOURCES,	*	
INC., and	*	
ENTERGY SERVICES, INC.	*	
* * * * * * * * * * * * * * * * * * * *	*	

COMPLAINT OF THE LOUISIANA PUBLIC SERVICE COMMISSION

I. INTRODUCTION

1. This Complaint is submitted on behalf of the Louisiana Public Service Commission ("LPSC") pursuant to Rule 206 of this Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.206, and pursuant to Sections 206, 306, and 309 of the Federal Power Act, 16 U.S.C. § 824e, 825(e), and 825(h). The Complaint seeks changes in the formula rate used by System Energy Resources, Inc. ("SERI") in billing the costs of the Grand Gulf nuclear unit under a Unit Power Sales Agreement ("UPSA") to affiliated companies, Entergy Arkansas, Inc. ("Entergy Arkansas"), Entergy Louisiana LLC ("Entergy Louisiana"), Entergy Mississippi, Inc. ("Entergy Mississippi) and Entergy New

Orleans, Inc. ("Entergy New Orleans"). The complaint also seeks refunds for the statutory refund period for unlawful rates.

II. SUMMARY OF THE COMPLAINT ISSUES

- 2. The complaint seeks changes in the UPSA's formula rate to correct unjust and unreasonable aspects of the formula provisions for billing the return on equity, the amount of equity in the capital structure, and depreciation expense.
- Return on equity. SERI's current return on equity allowance a. is unjust and unreasonable given SERI's unique circumstances and current market conditions. SERI's equity has virtually no risk and in most material respects resembles a high-quality bond. SERI is a wholly-owned subsidiary of Entergy Corp. ("Entergy") that owns 90 percent of a single generating unit, the Grand Gulf nuclear power station located in Port Gibson, Mississippi. It sells the output of the Grand Gulf generating unit to four other Entergy subsidiaries, which are committed to pay SERI's costs. A decision of the United States Supreme Court, Mississippi Power & Light Co. v. Mississippi ex rel Moore, 487 U.S. 354, 108 S.Ct. 2428, 101 L.Ed.2d 322 (1988), requires that retail regulators treat all SERI's wholesale charges as reasonable for retail ratemaking and permit their collection in retail rates. Also, the purchasing companies have undertaken, in separate agreements, to guarantee the payment of all SERI's expenses and obligations. SERI has for decades collected all of its costs, even though those costs substantially exceeded the cost of equivalent electric energy available in the market. Entergy's investment in SERI relates to a single asset; the cash flow does not grow, but is reduced over time as the investment is

depreciated, just as the principal investment in a bond is reduced over time. As SERI's equity risk is equivalent to or less than the risk of a utility bond, a reasonable return on equity should not substantially exceed prevailing bond yields.

Even if SERI were a more typical electric utility, its currently-authorized return on equity would be unjust and unreasonable. SERI's 10.94 percent return on equity is excessive given current market conditions. Application of the Commission's two-step DCF method shows that SERI's allowed return on equity should be no more than 7.74 percent. Because of SERI's extremely small risk, the allowed return on equity should be set below that level, but above the yield for utility bonds with similar risk, which is 4.23 percent.

b. *Capital structure*. SERI's capital structure for billing, as of January 2017, included 66.24% equity and 33.76% debt. The equity ratio on that bill was filed with SERI's August, 2017 filing in Docket No. ER17-2219 and is the most recent billing data available to the LPSC. SERI's third quarter 2017 Form 1 report indicates that its equity ratio for billing was 64.9%. This equity ratio is grossly excessive for a company with SERI's extremely low risk. Entergy's overall equity ratio is 35.8% and the operating companies that are SERI's customers have equity rates on average of less than 49%. [Entergy 10-K Annual Report at 53; Attach. A at 25]. SERI's equity is financed in large part with debt. Entergy uses SERI's unduly excessive equity ratio to subsidize other more leveraged operations, including competitive operations. SERI's equity ratio for ratemaking should be capped at a maximum of 49%.

c. **Depreciation.** SERI's proposed depreciation rates, currently incorporated in rates and subject to refund in Docket No. EL17-93, are excessive. SERI included certain capital additions associated with a portion of Grand Gulf that is sold and leased back under a Sale-Leaseback transaction in developing its depreciation rates, even though those additions are being recovered as rent. SERI included estimated future additions, seeking to bill ratepayers currently for plant additions that are speculative and will not be in service for years, if ever. SERI included interim retirements in the depreciation study, but did not exclude unusual and non-recurring interim retirements, particularly those made in the 2011-2012 period, when more than \$500 million was invested in the plant. A depreciation study should exclude non-recurring interim retirements in developing retirement curves in estimating remaining life. The Commission should set these additional depreciation issues for hearing and establish a refund-effective date.

III. PARTIES

3. The Louisiana Public Service Commission regulates certain public utilities operating in Louisiana pursuant to Article 4, Section 21 of the Louisiana Constitution of 1974. It regulates the retail rates and services of Entergy Louisiana. SERI is a wholly-owned subsidiary of Entergy Corp. ("Entergy"), with its principal office located in Jackson, Mississippi. Entergy Services, Inc. ("ESI") is a service subsidiary of Entergy that provides accounting, legal, regulatory and other services to Entergy subsidiaries, including representation of the regulated companies as their agent in proceedings before

the Commission. Entergy Corp is a utility holding company headquartered in New Orleans, Louisiana.

IV. COMMUNICATIONS

4. The names of the persons to whom correspondence, pleadings, and testimony with regard to this docket should be addressed are as follows:

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Dana M. Shelton*
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The LPSC requests waiver of Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to permit the above-indicated representatives of the LPSC to be informed of all matters in this proceeding.

V. DESCRIPTION OF PENDING CASE

5. Two of the issues raised in this complaint have some overlap with issues pending in another case before the Commission – the consolidated proceeding in *Arkansas Pub. Serv. Comm'n v. System Energy Resources, Inc.*, Docket No. EL17-41, cons.

^{*}Persons designated for service.

w/ Docket Nos. ER17-2219 and EL17-93. That proceeding involves SERI's return on equity, but the complaint in that case does not reflect more recent economic data that is now available and forms part of the basis for this complaint, and does not provide an economic analysis of the effect of the similarity of SERI's equity to a high-quality bond on investor return requirements. The pending proceeding also involves depreciation rates, but the Commission's Order setting that case for hearing did not identify the issue relating to unusual and non-recurring interim retirements in the depreciation study, or the inclusion of Sale-Leaseback capital additions related to SERI's Sale-Leaseback investment in the depreciation study. The issues raised in the complaint are based on new data and new issues, requiring the establishment of a refund-effective data in this case pursuant to Section 206(b) of the FPA.

VI. REQUEST FOR EXPEDITED REVIEW

6. The pending case is currently in settlement negotiations and it appears that settlement efforts will not be successful, at least in part. That case may move to the hearing phase in May. The Commission should expedite the handling of this complaint to permit the opportunity, if the Commission chooses, for consolidation of the proceedings for a single hearing.

VII. BASIS FOR COMPLAINT ISSUES

A. Return on Equity.

- 7. Comparative risk of equity investment in SERI.
- a. SERI's existing return on equity of 10.94% was established in *System Energy Resources, Inc.*, 92 F.E.R.C. ¶ 61,119 (2000) ("SERI"), based on a record

that was developed in the mid-1990s. Conditions have changed significantly since that time and, more particularly, have changed since the complaint in Docket No. EL17-41 was filed. Since 2000, when *SERI* was decided, investor return requirements have fallen significantly, interest rates have fallen, and inflation has decreased. Moreover, the Commission in that case considered only some of the unique circumstances that remove virtually all risk from an equity investment in SERI. Entergy's equity investment in SERI has a risk profile equivalent to a low-risk bond, because under Supreme Court precedent it is backed not only by four of the Entergy operating companies, buy by their retail customers as well. *Mississippi Power & Light Co. v. Mississippi ex rel Moore*, 487 U.S. 354, 108 S.Ct. 2428, 101 L.Ed.2d 322 (1988).

b. The United States Supreme Court established the standard for fixing the return on equity of a regulated utility in *Federal Power Comm'n v. Hope Nat'l Gas Co.*, 320 U.S. 591, 64 S.Ct. 283, 88 L.Ed. 333 (1942) and *Bluefield Water Works & Improvement Co. v. Public Serv. Comm'n*, 262 U.S. 679, 43 S.Ct. 675, 671 L.Ed. 1176 (1923). The Court in *Hope* made clear that the utility's risk must be considered in setting the return on equity. It said:

[T]he return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and attract capital.

Id. at 603. Bluefield also found that the return on equity should reflect the utility's comparative risk. It held that the utility is entitled to a return equivalent "to that generally being made at the same time and in the same part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties."

262 U.S. at 692.

- c. In the case of SERI, Entergy as its equity investor and Entergy's shareholders face almost no risk. SERI sells all of its output to four utilities that are also wholly owned by the same parent, Entergy, and are obligated pursuant to the UPSA to buy the power SERI generates and pay the costs. They are also separately obligated to stand behind SERI's financial commitments. *See Middle South Energy, Inc.*, 26 F.E.R.C. ¶ 63,044 at 65,012 (1984) ("All four operating companies, including AP&L, are still financially liable for Grand Gulf costs in proportion to the specific percentages set forth in in the Second Amendment to the Availability Agreement (June 15, 1981) (Ex. 1, p. 15)."). Moreover, unlike almost any other utility, SERI's rates are backed by a decision of the Supreme Court mandating that the charges be assessed to ratepayers in retail rates. The combination of these factors eliminates almost all risk associated with an equity investment in SERI.
- d. SERI has entered multiple agreements with the four Companies that purchase its power, which guarantee payment of SERI's costs, including investment costs. First, Entergy and four of Entergy's wholly-owned subsidiaries -- Entergy Arkansas, Entergy Louisiana, Entergy Mississippi and Entergy

New Orleans – are parties to the UPSA, which obligates the purchasers to pay the costs associated with Grand Gulf in specified percentages, regardless of the amount of energy delivered. SERI's 2017 Form 1 report states:

System Energy has agreed to sell all of its share of capacity and energy from Grand Gulf to Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans in accordance with specified percentages (Entergy Arkansas - 36%, Entergy Louisiana – 14%, Entergy Mississippi – 33%, and Entergy New Orleans – 17%) as ordered by the FERC. Charges under this agreement are paid in consideration for the purchasing companies' respective entitlement to receive capacity and energy and are payable irrespective of the quantity of energy delivered. . . .

[SERI 2017 Form 1 at 123.23 (emphasis added)]. Also, the Form 1 explains that the purchasing companies are separately obligated to pay for their entitlement shares under a Capital Funds Agreement: "System Energy has entered into agreements with Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans whereby they are obligated to purchase their respective entitlements of capacity and energy from System Energy's interest in Grand Gulf, and to make payments that, together with other available funds, are adequate to cover System Energy's operating expenses." [*Id.*]. Further, the Form 1 explains that the purchasers are also obligated to pay SERI's costs under an Availability Agreement. It states:

Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans are individually obligated to make payments or subordinated advances to System Energy in accordance with stated percentages (Entergy Arkansas – 17.1%, Entergy Louisiana – 26.9%, Entergy Mississippi – 31.3%, and Entergy New Orleans – 24.7%) in amounts that, when added to amounts received under the Unit Power Sales

Agreement or otherwise, are adequate to cover all of System Energy's operating expenses as defined, including . . . expenses named in connection with a permanent shut down of Grand Gulf. . . .

[*Id.* at 123.24]. These agreements shift SERI's risk to the purchasing companies and eliminate virtually all of the risk of an investment in SERI's equity.

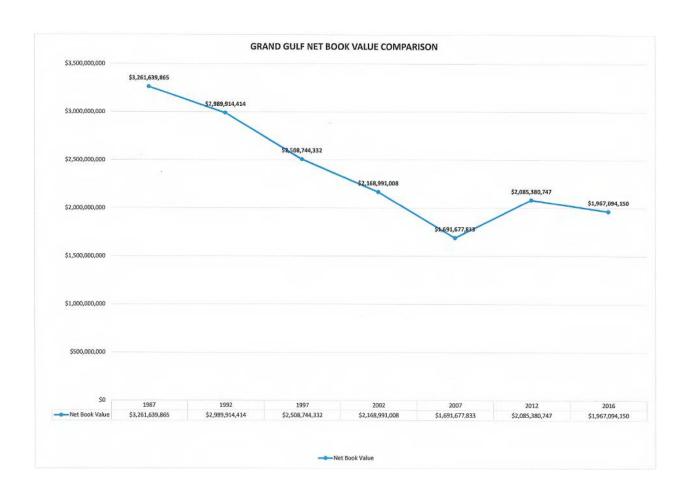
e. SERI's costs are billed to Entergy Arkansas, Entergy Louisiana, Entergy Mississippi and Entergy New Orleans under a FERC cost-of-service formula rate, which provides for the recovery of all Grand Gulf costs on a monthly basis. The formula rate adds to the already formidable security of the investment in SERI. Glenn E. Harder, SERI's treasurer and vice-president of accounting in 1991, testified in a deposition in Docket No. ER89-676 that the formula rate lowered SERI's capital costs. He testified:

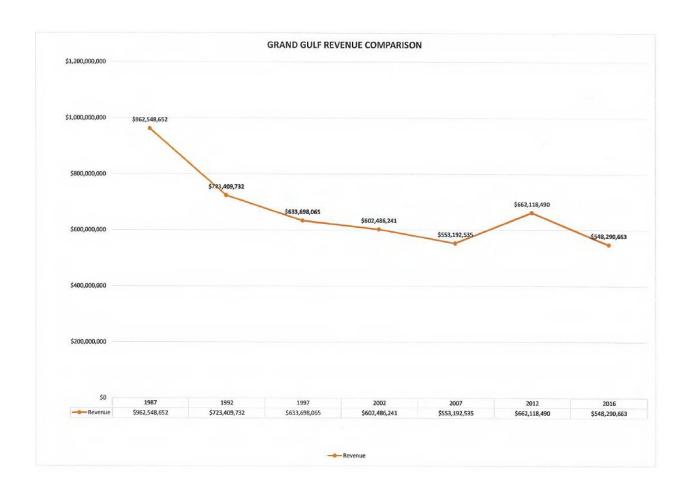
The formula method or the unit power sales agreement method also is a benefit to customers because the ability to finance is enhanced, I believe, with the Unit Power Sales agreement structure in that lenders are, at least to a degree of comfort, higher than they would have should System Energy use a test period base rate structure, can rely on the fact that the bills will be sent out and costs incurred will in fact be paid on a monthly basis to the extent they're prudent costs. That is of benefit in access to capital markets, probably has resulted in us being able to finance in times where otherwise we possibly would not have been able to finance and does produce some cost of money benefit, I would presume.

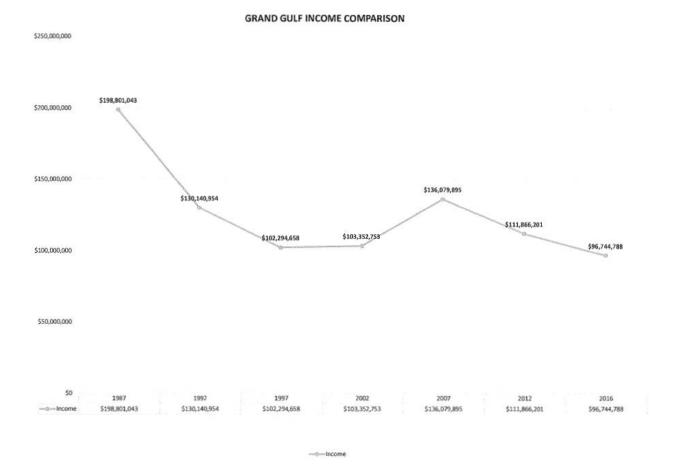
[Attach. B, Depo. of Glenn E. Harder, Docket No. ER89-676 at 17 (Apr. 29 and 30, 1991)].

f. Entergy's return on its equity investment in SERI resembles an investment in a bond more than a typical investment in a utility stock. SERI is a one-asset utility in which the rate base generally shrinks as depreciation exceeds new investment. In

that respect SERI's investment resembles the principal amount of a bond. Also, SERI's extremely low risk resembles the risk of an extremely secure bond with strong guarantees of ultimate payment. Entergy has no basis to expect long-term growth in earnings, dividends, book value, or cash flow from SERI. As the rate base shrinks, so do revenues, income and cash flow. Since 1987 SERI's net book value has diminished by more than \$1 billion, its revenue by more than \$400 million, and its net income by more than \$100 million, as shown on SERI's Form 1 reports and depicted on the following charts, which are all based on SERI's Form 1 data for the years that are reflected.







Entergy can expect the same type of return on its equity investment in SERI as a bond investor in SERI can expect – a virtually risk-free cash flow on a diminishing investment base.

g. The equity investment in SERI resembles a highly secure bond because the obligation is backed by a virtual guarantee of support from ratepayers. The Supremacy Clause of the United States Constitution and a Supreme Court decision establish that all SERI's costs that are part of the filed rate must be reflected in retail rates – a situation that distinguishes SERI from virtually any other utility investment. The extremely low risk is demonstrated by the fact that since its rates first went into effect, they

have exceeded prevailing market prices by huge margins, yet they have all been assessed and collected. SERI over its entire life has produced power at above-market prices, yet it has collected all its costs in billings to affiliates. In 1991, SERI's vice-president testified that SERI's rates exceeded 11 cents per kilowatt-hour (\$110 per megawatt hour) in 1990, a figure far above market prices. In the deposition in Docket No. ER89-678, he testified:

For the years of 1990, it was somewhere between 11 and 12 cents a kilowatt hour. This year, year to date, I would say we're probably running at nine or under cents per kilowatt hour. The reason – or let me just talk about the other way of comparing the costs. You know, the historical capital investment for Grand Gulf was a significant capital investment. So, if you track the cost – total cost billed, including return on the capital investment and depreciation of the capital investment, Grand Gulf is costly compared to other sources of power.

[Attach. B, Depo. of Glenn E. Harder at 21]. Even today, after a large reduction in the investment in SERI, its rates in 2017 on average were \$96.50 per MWH, while all-in LMP prices in the region have been roughly \$30 per MWH. [SERI 2017 Form 1 p. 311 (generation 6,675,148 MWH; revenues \$644,458,383); Attach. A at 13 n.8]. In 2017, SERI's cost per MWH was even higher – more than \$100 per MWH. [2016 SERI Form 1 at 311]. In both years Grand Gulf presumably had extended outages, but SERI was paid even when it could not supply power. In a competitive market, SERI would be a failed company; its continued highly successful survival is due to guarantees provided through regulation.

h. FERC precedent establishes that the low risk of a single-asset generating company selling to affiliates must be taken into account in establishing the rate

of return on common equity. S. Carolina Gen. Co., 40 F.E.R.C. ¶ 61,116 (1987), on reh'g, 43 F.E.R.C. ¶ 61,217, on reh'g, 44 F.E.R.C. ¶ 61,008 (1988) (cost of debt sets lower boundary of return on equity range); Consumer Adv. Div. of W. Va. Pub. Serv. Comm'n, 40 F.E.R.C. ¶ 61,117 (1987), on reh'g, 42 F.E.R.C. ¶ 61,245 (1988) (adjust return on equity downward); Indiana & Michigan Power Co., 4 F.E.R.C. ¶ 61,316 (1979).

i. In *System Energy Resources*, *Inc.*, 96 F.E.R.C. ¶61,165 (2001), the Commission distinguished SERI from a higher-risk utility in connection with a return on equity analysis. The Commission stated:

SERI is also seeking a return on rates for power from its single principal asset, a nuclear generating unit. Moreover, recovery of SERI's costs and a reasonable return are guaranteed, because the four Entergy operating companies are committed to purchase the output of Grand Gulf I under a long-term Unit Power Sales Agreement that we have approved.

Id. at 61,734. The Commission also observed that SERI does not face the risks associated with a need to purchase electricity: "SERI simply does not face that risk because its only business is selling, and it sells the entire output of its facility to its corporate affiliates under a guaranteed, long-term contract." *Id.*

j. Given the similarity between the equity investment in SERI and a bond, the Commission could adopt a different framework altogether for establishing SERI's return on equity than it would use for a typical utility. The Commission is required under *Hope* and *Bluefield* to establish a return commensurate with investments with *similar risk*. Given that standard, and SERI's bond-like risk, SERI's return on equity should be set at a level not substantially in excess of the cost of debt. Thus, the Commission could:

• Establish the cost of equity at 100 basis points above the cost of debt for companies with similarly-rated bonds, here 4.23% for Moody's Baa utility bonds.

Alternatively, the Commission could accept a more traditional analysis and make a downward adjustment for SERI's low risk. Alternatives include:

- Perform a two-step Discounted Cash Flow ("DCF") analysis using the Commission's methodology and establish the return on equity at the bottom of the reasonable return range here 6.21% based on the analysis of the LPSC's expert witness, R. Lane Sisung;
- Select the median of the lower half of the return on equity range using the Commission's two-step DCF methodology –here 7.08% according to the analysis of Mr. Sisung.
- 8. Discounted Cash Flow Analysis Using Companies that Would Be Comparable to SERI If It Had Normal Utility Risk.
- a. Even if SERI is treated as a normal utility, without the extreme risk insulation outlined in the above paragraphs, SERI's authorized rate of return on equity is excessive and results in unjust and unreasonable rates. The LPSC provides economic evidence that SERI's return on equity under current market conditions is no higher than 7.74%. A risk-adjusted return on equity for SERI would be 7.08%.
- b. Attached to this complaint is the affidavit of R. Lane Sisung, an expert in utility financial analysis, economics and accounting. [Attach. A]. Mr. Sisung performed a two-step Discounted Cash Flow ("DCF") analysis of SERI, based on utility companies with comparable bond ratings, using the single-company version of the Commission's two-step DCF analysis set forth in *Coakley v. Bangor Hydro-Elec. Co.*, *Opinion No. 530*, 147 F.E.R.C. ¶ 61,234, *Opinion No. 531-A*, 149 F.E.R.C. ¶ 61,032

(2014), and Ass'n of Bus. Advocating Tariff Equity v. Midcontinent Indep. Sys. Operator, 156 F.E.R.C. ¶ 61,234 (2016).

- c. Applying the Commission's two-step DCF analysis, Mr. Sisung concludes that a reasonable rate of return on equity for utilities with bond ratings comparable to those of SERI is 7.74 percent, the median of the return-on-equity range established by an analysis of 25 electric utilities with similar ratings. Mr. Sisung began with a group of 40 utilities and eliminated 15, based on criteria applied in the Commission's precedents. The median of the lower end of the range, which should be used to reflect SERI's unique low risk, is 7.08 percent.
- d. Mr. Sisung presents an analysis of current market conditions and concludes that the conditions currently are not "anomalous," as the Commission suggested they might be in *Coakley*, which reflected conditions five years ago. [Attach. A at 25-26]. Interest rates have been rising moderately, but they are low by historical standards and they are expected to remain low by historical standards because inflation is expected to be low. There is no indication that the DCF model has any deficiency that prevents it from functioning appropriately when interest rates are low; indeed, interest rates will virtually always vary from the average. Mr. Sisung states that "I know of no empirical evidence demonstrating that low interest rates prevent the DCF model from functioning as designed." [Id. at 26].
- e. Mr. Sisung concludes that if SERI did not have unique circumstances that insulate it from normal utility risks, a reasonable return on equity would

be 7.74 percent. This return is 320 basis points below the currently-authorized 10.94 percent. Considering special risk factors, the return on equity reasonably should be set at 7.08 percent. SERI's return on equity is excessive and unjustified given current market conditions.

B. Capital Structure.

9. A monthly bill that SERI attached to its filing in Docket No. ER17-2219 shows that for March, 2017, SERI billed the purchasing Companies based on a capital structure that contained an equity ratio of 66.2 percent. Based on the 2017 Form 1 report that SERI recently filed, the equity ratio for billing purposes appears to be 64.9% as of December 31, 2017. [SERI 2017 Form 1 at 112, 256-57 (Equity \$710.8 million, debt \$384 million excluding Sale/Leaseback)]. This capital structure is unusually rich in equity and cross-subsidizes more highly leveraged investments of the parent, Entergy. According to the 10-K report for 2017 filed by Entergy, the consolidated equity ratio of the Company's combined operations is 35.8 percent, reflecting equity of \$7.993 billion and long-term debt of \$14.315 billion. [Entergy Corp. 10-K Report at 53]. The equity ratio is even lower if notes payable and commercial paper are considered. Thus, it is apparent that Entergy has pushed up the SERI equity ratio to cross-subsidize more highly-leveraged activities. SERI's capital structure has not been reviewed in many years. Entergy has permitted SERI's equity ratio to climb to an exorbitant level because the return costs flow through to the purchasers under an automatically-adjusted formula rate.

- agreements, SERI has transferred almost all of its risk to the purchasing Entergy Companies. Yet SERI's capital structure has an equity ratio that is far *greater* than the composite equity ratio of its customers. Mr. Sisung shows that the composite equity ratio of SERI and the customers is less than 49 percent. [Attach. A at 27]. SERI, a much less risky utility, has no need for an equity ratio in excess of 49 percent. Indeed, as it has no risk, SERI's equity ratio reasonably could be adjusted to a more historical norm of approximately 35-40 percent.
- 11. Mr. Sisung shows that the average equity ratio of electric utilities in the United States, as classified by the Value Line Investment Survey, is 48.45 percent in 2018. [*Id.*]. SERI is a utility with extremely low risk compared to the average U.S. electric utility. SERI does not need an equity ratio higher than the average of other utilities having substantially greater risk than SERI.
- 12. SERI has an obligation to maintain a capital structure that is reasonable in cost to consumers. It has not done so. With the luxury of a formula rate that has no automatic review procedures, SERI has increased the equity-richness of its capital structure to a level that is extremely exorbitant for a utility with SERI's risk profile. The capital structure combined with an excessive return on equity create a windfall for SERI's stockholder and a burden for consumers.
- 13. The Commission should adjust SERI's capital structure for ratemaking to a more normal and reasonable level, reflecting SERI's extremely low risk.

The equity ratio should be no higher than 49 percent – the equity ratio of SERI combined with those of the purchasing affiliates. Indeed, in a case involving a utility similar to SERI, the Commission adjusted the utility's equity ratio and capital costs to reflect a 35% equity ratio. *Indiana & Michigan Power Co.*, 4 F.E.R.C. ¶ 61,316 (1978). SERI operates under similar circumstances, but with even less risk, and should not be permitted to charge customers based on a capital structure unduly rich in equity.

C. Depreciation.

- 14. On August 1, 2017, SERI filed revised depreciation rates in Docket No. ER17-2219-000 to reflect a life extension of the Grand Gulf plant granted by the Nuclear Regulatory Commission on December 1, 2016. The APSC and Cooperative Energy, a co-owner of Grand Gulf, filed protests and other parties commented or intervened, including the LPSC. On September 29, 2017, the Commission instituted an investigation of SERI's revised depreciation rates, with a refund-effective date of October 1, 2017, in Docket No. EL17-93-000.
- 15. The LPSC is participating in the pending proceeding in which SERI's revised depreciation rates are being investigated. The LPSC files this portion of the complaint to raise additional issues that were not raised in the protests to SERI's depreciation rate filing. The LPSC agrees with and reiterates the previously identified primary issues related to SERI's depreciation filing, including: a) SERI included future interim additions in the study, which requires ratepayers to pay currently for investments that may be made in the future, which conflicts with the "used and useful" ratemaking

requirement and reflects speculation concerning the size, timing, and need for future additions, and b) SERI's interim retirement study reflected experience of a limited data set, 1998-2016, and provided insufficient information concerning the fit of retirement curves to the data. *System Energy Resources, Inc.*, 160 F.E.R.C. ¶ 61,140, ¶¶ 12-15 (2017).

16. The depreciation study is deficient for reasons beyond those raised in the protests in Docket No. ER17-2219. SERI included interim retirements based on a study of retirements from 1998-2016, but did not remove large interim retirements that are not likely to recur in the remaining life of Grand Gulf from the study. Under Commission precedent, unusual and non-recurring retirements should be removed from interim retirements in estimating remaining life. In *Entergy Servs., Inc.*, 142 F.E.R.C. ¶ 61,022 (2013), the Commission applied guidelines published by the National Association of Regulatory Utility Commissioners ("NARUC") in the NARUC Depreciation Manual, to require the removal of an unusual steam generator replacement in a nuclear plant from interim retirements in a depreciation study. The Commission summarized with approval the NARUC guideline:

The NARUC Depreciation Manual, which sets forth the guidelines for including an event in an interim retirement history, states that historical data used to forecast future retirements should not contain events that are either anomalous or unlikely to recur.

Id., ¶ 127.

17. As shown on the chart depicted above on page 11, SERI's net investment rate base increased by nearly \$400 million between 2007-12, even though its

depreciation expense exceeds \$100 million per year. Thus, SERI invested at least \$900 million in that period. Between 2010-2012, according to SERI's Form 1 reports, SERI invested \$538 million in the plant. During that period SERI undertook a major uprate of the plant, which involved the replacement of major components, including the steam dryer, main generator, high pressure turbine rotor, heat exchangers, main feedwater heaters, moisture separator heaters, and main transformers, according to published reports. [Attach. C]. Many of the retirements associated with this uprate are likely to be unusual and non-recurring, yet SERI included them all in its limited-term interim retirement analysis.

- 18. SERI has included capital additions to the Grand Gulf Sale-Leaseback in its depreciation study even though it includes the Sale-Leaseback lease payments in rates as rent expense. Capital improvements are the property of the lessor, not SERI, according to the Sale-Leaseback agreement, Section 8(c), (e). [Attach. D (excerpt)]. SERI renewed the Sale-Leaseback lease in 2015 and, in effect, acquired the same assets as leased property that it includes in depreciation. Allowing both recoveries is an unjust and unreasonable double recovery.
- 19. The LPSC requests that the Commission institute an investigation with respect to these additional deficiencies in SERI's depreciation study and set a refund-effective date accordingly.

VIII. OTHER REQUIREMENTS OF RULE 206

The LPSC provides the following additional information required by Rule 206 of the Rules of Practice and Procedure.

- 20. *Effect on complainant.* (*Rule 206(b)(3)*). The LPSC regulates the retail rates charged by Entergy Louisiana and is required to include costs billed under the UPSA. The LPSC represents the interests of Louisiana consumers with respect to SERI's rates.
- 21. *Financial impact.* (*Rule 206(b)(4)*). SERI earns an equity return on more than \$800 million of its rate base, given its equity ratio. A reduction in the return on equity would reduce its revenue requirement by more than \$10 million annually per percentage point of reduction (including taxes). A reduction in the equity ratio to 49 percent would reduce the annual revenue requirement by approximately \$20 million. A reduction in the depreciation rate of .5 percentage point would reduce annual depreciation expense by about \$21 million.
- 22. *Other impacts.* (*Rule 206(b)(5)*). The LPSC is unaware of any environmental, operational, or nonfinancial impacts related to the complaint.
- 23. **Dispute resolution.** (Rule 206(b)(9)). Settlement procedures are in effect for the pending case, with a final settlement conference scheduled May 1, 2018. If the issues in that case do not settle, the LPSC believes the issues raised in this complaint cannot at this time be settled and the issues should proceed directly to a hearing, with possible consolidation of the cases.
- 24. *Forum of Notice.* (Rule 206(b)(10). A form of notice is attached as Attachment E.

IX. REQUEST FOR RELIEF

The LPSC requests that the Commission set this complaint for hearing, establish a refund-effective date pursuant to Section 206(b) of the Federal Power Act, and after due proceedings reset SERI's return on equity, its equity ratio, and its depreciation rates to a just and reasonable level. The LPSC also requests such other relief as justice requires.

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Respectfully submitted,

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Attorneys for the Louisiana Public Service Commission

CERTIFICATE

I hereby certify that a copy of the above and foregoing Complaint of the Louisiana Public Service Commission has been served upon the Respondents, through their authorized representatives, and other interested parties by email this 27th day of April, 2018.

Michael R. Fontham

ATTACHMENT A

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

LOUISIANA PUBLIC SERVICE	*	
COMMISSION	*	
	*	
VERSUS	*	DOCKET NO. EL18-
	*	
SYSTEM ENERGY RESOURCES, INC.,	*	
and	*	
ENTERGY SERVICES, INC.	*	
* * * * * * * * * * * * * * * * * * * *	*	

AFFIDAVIT

OF

R. LANE SISUNG

ON BEHALF OF THE

LOUISIANA PUBLIC SERVICE COMMISSION

APRIL 26, 2018

Contents

I.	QUALIFICATIONS	1
II.	PURPOSE AND SUMMARY OF TESTIMONY	2
III.	BACKGROUND	3
IV.	ALLOWED RETURN ON EQUITY	5
V.	EQUITY RATIO	24
VI.	DEPRECIATION	27
VII.	SUMMARY OF FINDINGS AND CONCLUSION	29

I. QUALIFICATIONS

- 2 Q. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT, TITLE, AND
- 3 **BUSINESS ADDRESS.**

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- 4 A. My name is R. Lane Sisung. I am a Managing Director of United Professionals
- 5 Company, LLC ("UPC"). My business address is 201 Saint Charles Avenue, Suite 4240
- 6 New Orleans, Louisiana. 70170.
- 7 Q. PLEASE DISCUSS YOUR EDUCATIONAL AND PROFESSIONAL
- 8 **BACKGROUND.**
- 9 A. I hold a Bachelor of Science degree in Accounting from Louisiana State University in
- Baton Rouge, Louisiana, and I then sat for and passed the Certified Public Accounting
- 11 Examination. I attended Loyola School of Law, where I was a member of the Law
- Review and received my Juris Doctor. I then furthered my legal and accounting
- education at the University of Florida where I received a L.L.M. in Tax Law. I am a fully
- licensed General Securities Representative (Series 7), General Securities Principal (Series
- 15 24), Municipal Securities Principal (Series 53), Options Principal (Series 4), Financial
- and Operations Principal (Series 27), and Registered Investment Adviser (Series 65). I
- am also a licensed insurance agent in the State of Louisiana and am a member of the
- 18 Louisiana State Bar. I have over two decades of experience in working on financial,
- regulatory, real estate and investment transactions. My primary endeavor is managing
- and providing regulatory consulting services for UPC.

1 Q. PLEASE BRIEFLY DESCRIBE YOUR PRIOR REGULATORY EXPERIENCE.

- 2 A. I have provided consulting and expert witness services in numerous regulatory matters
- 3 including rate determinations, mergers and acquisitions, prudence determinations,
- 4 forensic investigations and other general rulemaking matters. Please see Exhibit 1 as an
- 5 illustrative list of such services provided. In addition, I am currently advising the
- 6 Louisiana Public Service Commission ("LPSC") in matters related to the participation by
- 7 its investor owned utilities in the Midcontinent Independent System Operator, Inc.
- 8 ("MISO") and Southwest Power Pool, Inc. ("SPP") Regional Transmission Organizations
- 9 ("RTOs").

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II. PURPOSE AND SUMMARY OF TESTIMONY

11 Q. ON WHOSE BEHALF ARE YOU APPEARING?

12 A. I am appearing on the behalf of the Louisiana Public Service Commission ("LPSC").

13 Q. WHAT IS THE PURPOSE OF YOUR AFFIDAVIT?

- 14 A. The purpose of my Affidavit is to present my analysis of three issues associated with the
- 15 System Energy Resources' ("SERI") annual revenue requirement: return on equity
- 16 ("ROE"), capital structure, and SERI's current depreciation rates.

17 Q. HOW IS YOUR AFFIDAVIT ORGANIZED?

- 18 A. In my Affidavit, I first examine current market conditions, and how they relate to the just
- and reasonable cost of equity for SERI. Specifically, I demonstrate that SERI's current

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allowed ROE is excessive and should be decreased. Related to this issue of ROE, I then examine SERI's capital structure. In doing so, I compare the capital structure of SERI to that of its parent entity, Energy Corporation ("ETR"). I also discuss how the capital structure of SERI compares to that of other utilities within the Value Line Index. Finally, I discuss SERI's depreciation rate request, and I show that it is excessive. The final section of my Affidavit contains a summary of the findings from my analysis and a conclusion.

III. BACKGROUND

9 Q. PLEASE DESCRIBE CURRENT ECONOMIC CONDITIONS.

We are now entering the eleventh year since the financial crisis that emerged in the summer of 2007. The Federal Open Market Committee ("FOMC") has reported that the labor market continues to strengthen, as job gains have been strong in recent months and the unemployment rate has stayed low, and economic activity continues to rise at a moderate rate. The numerous special programs designed to support the liquidity of financial institutions and foster improved conditions in financial markets, which were aggressively implemented in response to the financial crisis and led to significant changes to the Federal Reserve's balance sheet, have now expired, closed, or been concluded. In October of 2017, the FOMC began a program for reducing the Federal Reserve's balance sheet, which it reports, "is proceeding smoothly." Nevertheless, "the stance of monetary policy remains accommodative." To this end, the FOMC has continued to keep the federal funds rate, which the Committee uses as the primary tool of monetary policy, low

in an effort to put downward pressure on long-term interest rates and ease overall financial conditions in order to fulfill its statutory objectives for monetary policy of maximum employment and price stability. And, statements made in recent FOMC Press Conferences suggest that, while modest rate hikes in the federal funds rate should be expected, the FOMC's now decade old policy of an "accommodative" federal funds rate is likely to continue for the foreseeable future. Indeed in the March 21, 2018 Federal Open Market Committee ("FOMC") statement, newly appointed Fed Chairman Jerome H. Powell stated, in explaining the FOMC's decision to raise the target rate for the federal funds rate by ¼ percentage point, bringing it from 1½ to 1¾ percent, that: "The Committee expects that economic conditions will evolve in a manner that will warrant further gradual increases in the federal funds rate; [however] the federal funds rate is likely to remain, for some time, below levels that are expected to prevail in the longer run."

Q. HOW HAVE FINANCIAL MARKETS RESPONDED IN THE CURRENT ECONOMY?

A. The Dow Jones Industrial Average ("DJIA") and Standard and Poor's 500 Index ("S&P 500"), and the Nasdaq Composite have all reached record highs in the first quarter of 2018. On January 26, 2018, the Dow Jones Industrial Average closed at a record 26,616.71, with the S&P 500 closing at 2,872.87 and Nasdaq hitting 7,505.77 the same

¹ Transcript of Chairman Powell's Press Conference March 21, 2018, available at: https://www.federalreserve.gov/mediacenter/files/FOMCpresconf20180321.pdf (emphasis added).

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day. Since peaking in January, financial markets have retreated some, but remained at historically high levels. FOMC Governor Lael Brainard stated in a speech recently at New York University that, "Financial conditions are currently supportive of economic growth despite the recent choppiness in financial markets and some tightening since the beginning of the year. Various measures of equity valuations remain elevated relative to historical norms even after recent movements, and corporate bond spreads remain quite compressed. This compares with the period from mid-2014 through the second half of 2016, when equity prices were flat and the dollar rose steeply."²

Q. HOW HAVE PUBLICLY-TRADED ELECTRIC UTILITIES FARED IN CURRENT FINANCIAL MARKETS?

The XLU, a SPDR ETF which seeks to provide investment results that correspond generally to the price and yield performance of the Utilities Select Sector Index, reached its high in November 2017. Over the prior six-month period ending February 28, 2018, roughly half of the publicly-traded companies that are, or own, U.S. electric utilities, as classified and covered as U.S. electric utility firms by the Value Line Investment Survey, saw increases in dividend yields.

IV. ALLOWED RETURN ON EQUITY

² Governor Lael Brainard, Navigating Monetary Policy as Headwinds Shift to Tailwinds, At the Money Marketeers of New York University, New York, New York (March 06, 2018) available at: https://www.federalreserve.gov/newsevents/speech/brainard20180306a.htm.

SERI'S ROE.

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1 Q. PLEASE EXPLAIN HOW CURRENT MARKET CONDITIONS RELATE TO

- 3 A. A utility's cost of equity, while it can be difficult to calculate, can be inferred through an 4 appropriate examination of current stock market data and widely disseminated financial 5 information. SERI's current ROE of 10.94% was set by the Commission in calendar year 2000, seventeen years ago, and in no way reflects the realities of current economic and 6 Indeed, SERI's currently-allowed 10.94% ROE is not just and 7 market conditions. 8 reasonable, as it is excessive by current economic and market conditions. A just and 9 reasonable allowed ROE for a utility of comparable risk should be set significantly less 10 than 10.94% by current market standards.
- Q. PLEASE DISCUSS THE ECONOMIC PRINCIPLES THAT YOU USED TO
 DETERMINE THAT SERI'S CURRENT RETURN ON EQUITY IS UNJUST
 AND UNREASONABLE.
- 14 A. Like other more definite costs, a utility's cost of equity is a legitimately recovered cost of
 15 a utility serving ratepayers. Unlike those other—more tangible costs—however, a
 16 utility's cost of equity usually needs to be determined from market data and conditions. If
 17 a utility's return on equity is set too high, shareholders in the company will earn a larger
 18 return than appropriate at the expense of the company's ratepayers. If, on the other hand,
 19 the utility's return on equity is too low, the utility may struggle to find investors to
 20 provide necessary capital to the utility. When the return on equity is set correctly, the

- utility is able to attract the necessary capital and investors and shareholders are able to
 earn an appropriate and fair return on equity.
- 3 Q. CAN YOU PLEASE EXPLAIN WHY SERI'S CURRENTLY-ALLOWED ROE IS
- 4 EXCESSIVE FOR A UTILITY OF COMPARABLE RISK BY CURRENT
- 5 ECONOMIC AND MARKET CONDITIONS?
- 6 A. Yes, but first I think it bears discussing why SERI's level of risk is not comparable to the
- 7 average publicly-traded companies that are, or own, U.S. electric utilities, as classified
- 8 and covered by the Value Line Investment Survey ("Value Line").

9 Q. WHAT IS DISTINCTIVE ABOUT SERI'S LEVEL OF RISK?

10 A. SERI is a wholly-owned subsidiary of Entergy Corporation ("Entergy" or "ETR"). 11 SERI's principal asset is its interest in the Grand Gulf nuclear station ("Grand Gulf"), a 12 nuclear power plant located in Port Gibson, Mississippi. Grand Gulf is only partially 13 owned by SERI, which owns a 90% interest in the facility, comprised of an approximate 14 78.5% ownership interest and an approximate 11.5% leasehold interest that resulted from 15 a 1988 sale/leaseback transaction. SERI operates the Grand Gulf unit, and sells power 16 from that unit to four customers, all of which, like SERI, are wholly-owned subsidiaries 17 of Entergy. Those customers are: Entergy Arkansas, Inc. ("EAI"), Entergy Louisiana, LLC ("ELL"), Entergy Mississippi, Inc. ("EMI"), and Entergy New Orleans, Inc. 18

("ENO").³ The costs and payments for those sales are governed by a Unit Power Sales Agreement ("UPSA"), a SERI wholesale rate schedule under the jurisdiction of the Federal Energy Regulatory Commission ("FERC"). Pursuant to that tariff, each Operating Company customer is allocated a certain percentage of SERI's costs through the Grand Gulf sales. EAI is allocated 36% of the costs, ELL is allocated 14%, EMI is allocated 33%, and ENO is allocated 17%. SERI's recovery of its costs and return on equity through the UPSA is its only source of revenue. In 2017, SERI received monthly revenue from each of its four customers in the following amounts: \$19.5 million for EAI, \$7.8 million for ELL, \$17 million for Entergy Mississippi, and \$9.4 million for Entergy New Orleans.⁴

The UPSA also obligates the Operating Companies to pay the costs of SERI for the life of the generating unit. And, the Operating Companies entered into an Availability Agreement, under which each Operating Company agreed to be responsible in identified percentages for Grand Gulf costs.⁵ SERI's FERC Form 1 Report states:

Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans are individually obligated to make payments or subordinated advances to System Energy in accordance with stated percentages (Entergy Arkansas-17.1%, Entergy Louisiana-26.9%, Entergy Mississippi-31.3%, and Entergy New Orleans-24.7%) in amounts that, when added to amounts received under the Unit Power Sales Agreement or otherwise, are adequate to cover all of System Energy's operating expenses as defined, including an amount sufficient to amortize the cost of Grand Gulf 2 over 27 years (See Reallocation Agreement terms below) and expenses incurred in connection with a

³ Individual referred to herein as ("Operating Company"); conjunctively referred to herein as ("Operating Companies").

⁴ See Entergy 2017 10K.

⁵ See 26 F.E.R.C. ¶ 63,044 at 65,102.

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permanent shutdown of Grand Gulf. System Energy has assigned its rights to payments and advances to certain creditors as security for certain obligations. Since commercial operation of Grand Gulf began, payments under the Unit Power Sales Agreement have exceeded the amounts payable under the Availability Agreement. Accordingly, no payments under the Availability Agreement have ever been required. If Entergy Arkansas or Entergy Mississippi fails to make its Unit Power Sales Agreement payments, and System Energy is unable to obtain funds from other sources, Entergy Louisiana and Entergy New Orleans could become subject to claims or demands by System Energy or its creditors for payments or advances under the Availability Agreement (or the assignments thereof) equal to the difference between their required Unit Power Sales Agreement payments and their required Availability Agreement payments.

System Energy, Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans entered into the Reallocation Agreement relating to the sale of capacity and energy from Grand Gulf and the related costs, in which Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans agreed to assume all of Entergy Arkansas's responsibilities and obligations with respect to Grand Gulf under the Availability Agreement. The FERC's decision allocating a portion of Grand Gulf capacity and energy to Entergy Arkansas supersedes the Reallocation Agreement as it relates to Grand Gulf. Responsibility for any Grand Gulf 2 amortization amounts has been individually allocated (Entergy Louisiana-26.23%, Entergy Mississippi-43.97%, and Entergy New Orleans-29.80%) under the terms of the Reallocation Agreement. However, the Reallocation Agreement does not affect Entergy Arkansas's obligation to System Energy's lenders under the assignments referred to in the preceding paragraph. Entergy Arkansas would be liable for its share of such amounts if Entergy Louisiana, Entergy Mississippi, and Entergy New Orleans were unable to meet their contractual obligations. No payments of any amortization amounts will be required so long as amounts paid to System Energy under the Unit Power Sales Agreement, including other funds available to System Energy, exceed amounts required under the Availability Agreement, which is expected to be the case for the foreseeable future.⁶

⁶ See SERI 2017 FERC Form 1, at 123.24 (April 16, 2018).

OF GRAND GULF COSTS?

Supreme Court found that:

The purchasing companies also entered into a Capital Funds Agreement with SERI, under which they agreed "to make payments that, together with other available funds, ae adequate to cover System Energy's Operating expenses." ⁷

Q. HAVE THE STATES EVER CHALLENGED THE PRUDENCE OR AMOUNTS

A. Yes. As Grand Gulf neared completion, agreements allocating Grand Gulf's capacity among the four Operating Companies, and setting wholesale rates for the sale of Grand Gulf's capacity and energy, were filed at FERC. Following extensive hearings, FERC entered an order allocating Grand Gulf costs. After public hearings, the Mississippi Public Service Commission ("MPSC") granted EMI an increase in its retail rates to enable it to recover the costs of purchasing its FERC-mandated allocation of Grand Gulf power. The Mississippi Attorney General, and certain other parties, representing Mississippi consumers appealed to the Mississippi Supreme Court, charging that, under state law, the MPSC had exceeded its authority by adopting retail rates to pay Grand Gulf expenses without first determining that the expenses were prudently incurred. The Mississippi Supreme Court found for the appellants. The United States Supreme Court then, however, reversed the judgment of the Mississippi Supreme Court. The U.S.

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⁷ *Id.* at 123.23.

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The Mississippi Supreme Court erred in adopting the view that the pre-emptive effect of FERC jurisdiction turned on whether a particular matter was actually determined in the FERC proceedings. See 506 So. 2d, at 986. We have long rejected this sort of "case-by-case analysis of the impact of state regulation upon the national interest" in power regulation cases. Nantahala, 476 U.S., at 966 (quoting FPC v. Southern California Edison Co., 376 U.S. 205, 215-216 (1964)). Congress has drawn a bright line between state and federal authority in the setting of wholesale rates and in the regulation of agreements that affect wholesale rates. States may not regulate in areas where FERC has properly exercised its jurisdiction to determine just and reasonable wholesale rates or to insure that agreements affecting wholesale rates are reasonable. FERC's jurisdiction to adjust the allocations of Grand Gulf power in the UPSA has been established. Mississippi, therefore, may not consistent with the Supremacy Clause conduct any proceedings that challenge the reasonableness of FERC's allocation.⁸

Thus, the U.S. Supreme Court, in essence, found that states may not bar regulated utilities from passing through to retail consumers FERC-mandated SERI rates, and states must permit the recovery of operating expense costs incurred as a result of paying a FERC-determined wholesale rate for a FERC-mandated allocation of power.

In Louisiana, meanwhile, the Nineteenth Judicial District Court overruled a refusal of the Louisiana Public Service Commission to include SERI's billings in retail rates. And, the U.S. Court of Appeals for the Eighth Circuit required the Arkansas Commission to recognize Grand Gulf costs in retail rates.

⁸ Mississippi Power & Light Co. v. Mississippi ex rel Moore, 487 U.S. 354, 374-75 (1988).

⁹ Louisiana Power & Light Co. v. Louisiana Public Service Comm'n, et al., No. 292,026 (La. 19th J.D.C., Oct. 9, 1985).

¹⁰ Middle South Energy, Inc. v. Arkansas Public Service Comm'n, 772 F.2d 404 (8th Cir. 1985).

Q. WHAT DOES THIS TRANSLATE TO WITH REGARDS TO THE RISK

2 ASSOCIATED WITH SERI?

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A.

The UPSA, supporting agreements, and the United States Supreme Court's decision in Mississippi Power requiring pass-through of the UPSA billings in retail rates, provide a virtual certainty that SERI will recover all of its costs and a return on equity on a monthly basis. The costs recovered by SERI through the UPSA include, among other things, decommissioning, depreciation and amortization, taxes, and a return on net utility plant. SERI's costs are recovered based on a certain fixed percentage established by FERC as opposed to recovery based on the usage levels of its four customers. Unlike other utilities, these characteristics provide SERI with a very high degree of certainty that it will recover all of its costs, as well as, a just and reasonable return on equity. In other words, SERI is insulated from the possibility of under-recovery that is present with most other utilities. SERI's cost per MWh is roughly two to three times that of contemporary market prices.¹¹ Yet, SERI still collects every dollar, even though the unit has historically proven, and continues to be, highly uneconomic. SERI's rate of return and cost recovery are thereby both guaranteed. And, the equity of all four of the ETR Operating Companies stands behind SERI's obligations. I explain all of this to highlight

¹¹ See 2016 State of the Market Report, at 2 (LMP "all in" prices 2015-16 have been in the range of \$25-\$30 per MWh); compare with, 2017 FERC Form 1 of ELL as filed on 4/16/2018; and 2016 FERC Form 1 of ELL as filed on 4/17/2017, at 311 (SERI average cost per MWh was \$96.50 in 2017, and over \$100 MWh in 2016); SERI "all in" cost is roughly \$69.87 per MWH; March 2017 bill (Rev. Requirement for capacity \$574,065,875. Grand Gulf is 1450 MW (Form 1 P. 123.5) SERI share of Grand Gulf is 90%. 1305 MW X 8760 HRS x 90% (assumed) capacity factor equals 10,288,620 MWH. \$632,400,000 divided by 10,288,620 equals \$61.47 MWH. Add fuel cost of \$8.40/MWH. (Energy Costs are based on ELL FAC filings in Other Purchased Power Report, Line 1 SERI; July 2015, Grand Gulf Calculations, Operations Month May 2015).

- the fact that the risk associated with the ownership and operation of Grand Gulf by SERI is lower than the average publicly-traded companies that are, or own, U.S. electric utilities, as classified and covered by *Value Line*, and as a result, so should SERI's ROE be lower.
- 5 Q. ARE THERE OTHER INSTANCES WHEN THE RISK ASSOCIATED WITH
 6 THE OWNERSHIP AND OPERATION OF A SUBSIDIARY GENERATION
 7 COMPANY HAS BEEN FOUND TO BE LESS THAN THAT OF A PARENT
 8 ENTITY, THE SUBSIDIARY GENERATION COMPANY'S ALLOWED
 9 RETURN ON EQUITY HAS BEEN REDUCED?
 - A. I understand that there is FERC precedent holding that, when the risk associated with the ownership and operation of a subsidiary generation company has been found to be less than that of a parent entity, the subsidiary generation company's allowed return on equity should be reduced. In my opinion, these decisions simply reflect the economic reality concerning low-risk subsidiaries such as SERI. In *S. Carolina Gen. Co.*, the Commission found that when a subsidiary generating company has a cost-of-service tariff with its parent, which permits immediate recovery of any increase in costs, thus limiting its risk and minimizing not only the risk of regulatory lag, but also the risk of disapproval, it will automatically make its allowed rate of return on equity regardless of whether it delivers the power or not. The steady stream of revenues from such an arrangement provides the subsidiary generating company with a very real advantage over those utilities not operating under similar cost-of-service tariffs. Finding that such a utility is significantly less risky than other utilities in the equity market, the Commission found that, in

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calculating the just and reasonable ROE of the subsidiary, it would be appropriate to use the equity return of the parent holding company as a proxy for the wholly-owned subsidiary, and then make downward adjustments within the zone of reasonableness to reflect an appropriate risk differential.¹² The Commission also established a floor for the zone of reasonableness indexed to the six-month average yield on BBB/Baa utility bonds.¹³ Similarly, in *Consumer Adv. Div. of W. Va. Pub. Serv. Comm'n* the Commission concluded that a subsidiary generating company's return on equity should be less than the percent calculated based on its parent entity's market cost of common equity, but higher than the average yield on Baa/BBB investment grade public utility bonds over the same six-month study period.¹⁴

Q. HAS THE COMMISSION COMMENTED DIRECTLY ON SERI'S RISK?

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13 A. Yes. I am aware that in its most recent decision setting SERI's ROE, the Commission
14 said: "Moreover, recovery of SERI's costs and a reasonable return are guaranteed,
15 because the four Entergy Operating Companies are committed to purchase the output of
16 Grand Gulf, under a long-term Unit Power Sales Agreement that we have approved."
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¹² S. Carolina Gen. Co., 40 F.E.R.C. ¶ 61,116 (1987) (says debt cost sets lower ROE boundary), on reh'g, 43 F.E.R.C. ¶ 61,217, on reh'g, 44 F.E.R.C. ¶ 61,008 (1988).

¹⁴ Consumer Adv. Div. of W. Va. Pub. Serv. Comm'n, 40 F.E.R.C. ¶ 61,117 (1987) (62 basis point reduction), on reh'g, 42 F.E.R.C. ¶ 61,245 (1988).

¹⁵ System Energy Resources, Inc., 96 F.E.R.C. ¶ 61,165 at p. 61,734 (2001).

- 1 Q. BASED ON THE PRECEDENT DISCUSSED ABOVE, WHAT APPROACHES
- 2 WOULD BE REASONABLE TO DETERMINE AN APPROPRIATE ROE FOR
- 3 SERI?
- 4 Using the precedent discussed above, there are at least three possibilities. First, as in S. A. 5 Car. Gen. Co., the Commission could use the ETR cost of equity derived using the Commission's approved discounted cash flow ("DCF") methodology to establish the high 6 7 end of the band of reasonableness, and the Baa cost of debt over the study period as the 8 floor of the ROE range. Alternatively, it would be reasonable to perform FERC's 9 standard DCF analysis, and simply use the lower end of the resulting ROE range 10 determined by the DCF analysis. Under this scenario, the above-discussed low level of risk associated with SERI would also support keeping low-end companies in the study, 11 12 rather than excluding them as outliers as might otherwise be appropriate, or perhaps 13 setting the Baa cost of debt over the study period as the floor of the ROE range. Another 14 option would be for the Commission, after performing a traditional DCF analysis, to 15 select the median of the lower half of the DCF range.
- 16 Q. IF ONE WERE TO USE THE PRECEDENT FROM S. CAR. GEN. CO., TO
 17 DETERMINE SERI'S ROE, WHAT WOULD THAT LOOK LIKE?

- A. Estimating ETR's current cost of equity through the performance of FERC's standard

 DCF analysis yields a result in a median of 8.03%. The full DCF analysis for SERI is

 set forth below. After setting the lower end of the band of reasonableness to the 4.23%

 Baa utility bond yield over the study period, that median figure drops to 7.94%, a figure

 between the high end and low end can be chosen. The most reasonable alternative is the

 median of the lower half of the analysis results, which is 7.21%.
- 7 Q. USING THE ALTERNATIVE METHOD, HAVE YOU ALSO PERFORMED A
 8 DCF ANALYSIS TO ESTIMATE SERI'S JUST AND REASONABLE ROE?
- 9 A. Yes, I have also used the Commission's preferred methodology for estimating the cost of equity, the DCF method.
- 11 Q. PLEASE DISCUSS YOUR APPLICATION OF THE DISCOUNTED CASH
 12 FLOW METHOD TO ESTIMATE SERI'S COST OF EQUITY.
- 13 A. A utility's cost of equity can be estimated based on the reasonable assumption that a
 14 typical investor in common stock is primarily concerned with expectations of cash flows
 15 to be produced by the stock. Those expectations of future cash flows consist of expected
 16 future dividends, as well as, capital gains or losses. Thus, in theory, the intrinsic value of
 17 a stock should reflect present value of a firm's expected future net cash flows discounted
 18 by the required rate of return. This discount rate will reflect investors' required rate of

Page 16

¹⁶ Please see discussion below on SERI DCF analysis for details of process related to performance of DCF analysis.

return, k, as investors assessing time value will use the rate of return that could be expected from comparable alternative investments. The stream of future dividends, D, will, in part, reflect the investor's estimate of how the dividends will grow in the future. If a stock is priced correctly, its expected return will equal the required return. Given these economic precepts, the DCF model estimates the investors' discount rate, or required rate of return. Preliminarily, investors' determination of price, P, will reflect the following equation.

$$P_0 = \frac{D_1}{1+k} + \frac{D_2}{(1+k)^2} + \frac{D_3}{(1+k)^3} + \frac{D_4}{(1+k)^4} + \frac{D_5}{(1+k)^5} + \frac{D_6}{(1+k)^6} + \dots$$

Where 1+k equals the discount rate.

as:

In the DCF model used at FERC, a simplifying assumption that dividends will have a constant rate of growth, g, is made in order to apply the formula. It then can be expressed

$$P_0 = \frac{D_0(1+g)}{1+k} + \frac{D_0(1+g)^2}{\left(1+k\right)^2} + \frac{D_0(1+g)^3}{\left(1+k\right)^3} + \frac{D_0(1+g)^4}{\left(1+k\right)^4} + \frac{D_0(1+g)^5}{\left(1+k\right)^5} + \frac{D_0(1+g)^6}{\left(1+k\right)^6} + \ \dots$$

The equation can then be solved as:

$$P_0 = \frac{D_0(1+g)}{k-g} = \frac{D_1}{k-g}$$

This formula can be converted to solve for k, the investor's required rate of return, because the current dividend of a stock is known, the price is known, and investor

- 1 expectations of growth can be estimated using published growth estimates of analysts.
- Thus, a simple version of the DCF formula would be the following:

$$k = \frac{\mathbf{p}}{\mathbf{p}} + \mathbf{g}$$

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The Commission uses a more refined version of the DCF model, which includes a half-year increase in the current dividend, as well as, an estimate of both short and long-term growth. The Commission's formula uses IBES estimates for short-term growth ("STg") weighted two-thirds, and estimates of growth in Gross Domestic Product, weighted one-third, for long-term growth (LTg). Thus, the formula is:

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$$k = (D/P) (1 + .5 g) + (STg) (2/3) + (LTg) (1/3).$$

- 15 Q. WHAT TIME PERIOD DID YOU SELECT FOR YOUR STUDY PERIOD?
- 16 A. I used a recent six-month Study Period of September 1, 2017 through February 28, 2018.
- 17 Q. HOW DID YOU BEGIN THE SELECTION OF YOUR PROXY GROUP OF COMPANIES?
- 19 A. I selected proxy companies that included publicly-traded companies that are, or own,
 20 U.S. electric utilities, and that *Value Line* classified as U.S. electric utility firms. I

- selected forty publicly-traded utility companies shown in *Exhibit 2*. This selection
- 2 process is consistent with the Commission's methodology.

3 Q. PLEASE DESCRIBE THE NEXT STEP.

4 A. I calculated the dividend yield for each company.

5 Q. HOW DID YOU CALCULATE THE ADJUSTED DIVIDEND YIELDS?

- 6 A. I calculated monthly dividend yields by dividing the annualized dividend at the end of the
- 7 month by the average of the high and low stock prices for the month. I then averaged the
- 8 monthly dividend yield over the six-month study period. The results of this calculation
- 9 are shown in *Exhibit 3*.

10 Q. WHAT DID YOU DO NEXT?

- 11 A. I determined for each company a composite growth rate, reflecting the weighted average
- of the short-term expected growth rate (weighted two-thirds) and long-term expected
- growth rate (weighted one-third).

14 Q. FROM WHAT SOURCE DID YOU OBTAIN THE SHORT-TERM GROWTH

15 RATES?

- 16 A. As required by the Commission, I used the IBES "five-year" expected growth rate. The
- 17 IBES "five-year" expected growth rates can be obtained from *Yahoo! Finance*, but I had
- to obtain the most recent IBES growth estimates by querying Alacra, which publishes the
- 19 official IBES data.

1 Q. HOW WERE THE LONG-TERM GROWTH RATES CALCULATED?

- 2 A. Per the Commission's method, I used the average of the long-term nominal GDP growth
- 3 estimates from IHS Global Insight, the U.S. Energy Information Administration, and the
- 4 Social Security Administration. Those long-term estimates are shown in *Exhibit 4* and
- 5 their average is 4.28%.

6 Q. HOW DID YOU USE THE DATA TO DETERMINE EACH COMPANY'S

7 IMPLIED COST OF EQUITY?

- 8 A. I obtained the adjusted dividend yield (with 6 months implicit growth) as required in the
- 9 Commission's method. Thus, I used the equation: (Unadjusted Dividend Yield * (1 +
- (Composite Growth Rate/2))) = Adjusted Dividend Yield. I then added the Adjusted
- Dividend Yield to the composite growth rate to determine the investor's cost of equity.
- The results for all forty companies are shown in *Exhibit 5*.

13 Q. WHAT ADJUSTMENTS DID YOU MAKE TO THAT INFORMATION,

14 CONSISTENT WITH COMMISSION REQUIREMENTS?

- 15 A. I applied the standard filters for excluding companies that are not suitable for a DCF
- analysis or not comparable in risk to the subject utility.

17 Q. AFTER APPLYING THE FILTERS, WHAT SIZE WAS YOUR PROXY GROUP?

- 18 A. From the initial universe of forty Companies, I removed fifteen, leaving a group of
- twenty-five results for a risk-comparable proxy group.

Q. HOW DID YOU APPLY YOUR FILTERS?

2 First, I removed three Companies that did not have recent IBES growth estimates for the A. 3 "five-year" short-term horizon used by the Commission. These were: ALLETE, Inc., 4 Avista Corporation, and MGE Energy. The IBES estimates for the remaining thirty-5 seven companies are shown in *Exhibit 6*. Second, I removed four companies that were involved in significant merger or acquisition 6 7 activity: Dominion Resources, Great Plains Energy, SEMPRA, and Westar Energy. 8 Third, I removed those Companies that did not have a credit rating from either Moody's 9 or Standard & Poors (S&P), one of the major U.S. credit rating agencies. And I removed 10 utilities that were not within one notch of SERI's Moody's rating or its S&P rating in the 11 same agency's credit ratings. SERI's credit rating from the same rating agency. SERI's 12 credit ratings are Baa1 and BBB+ from Moody's and S&P, respectively. The Companies 13 I removed were Eversource Energy, FirstEnergy, Hawaiian Electric, PNM Resources, 14 SCANA, and Vectren. 15 Fourth, I considered whether any outlying results should be removed as unreasonably 16 high or low. At the low end, the Commission has excluded results that are within 100 17 basis points of the average Baa utility bond yield. The Commission has also considered 18 whether there is more than a "natural break" between a low-end result and other DCF 19 results at the low end of the distribution. On the basis of that analysis, I removed Entergy 20 Corp. As I have noted, however, this may not be appropriate given SERI's extremely low 21 risk.

- 1 A. Lastly, I removed PG&E on the basis that the Company's board of directors suspended
- 2 the dividend of the company's common stock.
- 3 A. After removal of these fifteen companies' DCF results, twenty-five electric utilities
- 4 remained. They were shown on *Exhibit 7*. The median result in the group was 7.74%.
- 5 The median of the lower portion of the group from the lowest to the median was
- 6 7.08%.
- 7 Q. WHY DO YOU HIGHLIGHT THE MEDIAN AND THE MEDIAN RESULT IN
- 8 THE LOWER HALF?
- 9 A. FERC policy is to use the median DCF cost of equity for an individual utility that is
 10 comparable in risk to the DCF proxy group. However, as I have explained, SERI is
 11 actually much less risky than the other utilities in the proxy group. Providing SERI with
 12 the median return of the "comparable" group would be excessive, given the significant
 13 reduction in SERI's risk provided by the financial guarantees of the purchasing
 14 companies and U.S. Supreme Court precedent. The Commission could select the median
 15 of the lower portion of the DCF range to reflect SERI's lower risk.
- 16 Q. AS A FURTHER REFLECTION OF THIS DECREASED RISK, IF ONE WERE
- 17 APPLY THE PRECEDENT FROM S. CAR. GEN. CO. OF SETTING THE
- 18 LOWER END OF THE BAND OF REASONABLENESS TO THE BAA UTILITY
- 19 BOND YIELD OVER THE STUDY PERIOD TO THE SERI DCF ANALYSIS
- 20 RESULTS, WHAT WOULD THAT LOOK LIKE?

- 1 A. Using again the precedent from *S. Car. Gen. Co.*, and setting the lower end of the band of reasonableness to the 4.23% Baa utility bond yield over the study period, that median figure of the SERI DCF analysis results then drops to 7.67%, with a median of the lower half of the analysis resulting in 6.98%.
- 5 Q. ARE YOU AWARE THAT IN OPINION NOS. 531 AND 531-A, THE
 6 COMMISSION MADE AN UPWARD ADJUSTMENT TO A MIDPOINT
 7 RESULT (USED FOR A DISPARATE GROUP OF UTILITIES) FOR POSSIBLE
 8 "ANOMALOUS" CONDITIONS?
- 9 A. Yes.

- 11 Q. DO YOU BELIEVE MARKET CONDITIONS WERE ANOMALOUS IN THE 12 STUDY PERIOD?
- 13 A. No. When *Opinion No. 531* was decided in 2014, the economy was still recovering from
 14 the greatest recession in U.S. history since the great depression. That recovery period has
 15 ended, and the economy is now robust, with unemployment at historically low levels and
 16 most companies exhibiting strong earnings growth. Further, a factor relied on in *Opinion*17 *No. 531* was that interest rates were below 2 percent in the study period. The yield on
 18 10-year Treasuries is now approximately 3 percent, still historically low, but not
 19 anomalous in view of the low inflation that has prevailed and is expected to prevail in the

 $^{^{17}}$ 147 F.E.R.C. $\P 61,\!234,\, \P$ 145 n. 285 (2014).

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future. The low inflation and low interest rates have prevailed for long enough that the conditions cannot be considered anomalous. This is demonstrated in *Exhibit 8*, which arrays the Moody's Aaa Corporate Bond Yields, Moody's Baa Corporate Bond Yields, and 10-Year U.S. Treasury Bond Yields. Additionally, I know of no empirical evidence demonstrating that low interest rates prevent the DCF model from functioning as designed.

7 Q. PLEASE SUMMARIZE YOUR CONCLUSION AS TO SERI'S COST OF EQUITY.

9 A. SERI's existing 10.94% allowed ROE is excessive and renders SERI's rate unjust and unreasonable. Given SERI's extremely low risk, its return on equity should be set at not more than 7.08%, the midpoint of the lower part of the DCF range of proxy utilities.

V. EQUITY RATIO

Q. ARE THERE OTHER CONCERNS RELATED TO SERI'S COST OF CAPITAL THAT YOU WISH TO DISCUSS?

15 A. Yes. According to SERI's most recent FERC Form 1 and Entergy's SEC 10k filing,
16 SERI maintains a capital structure consisting of 63% equity and 37% debt. 18 This is an
17 extremely high equity ratio, which is out of proportion to a majority of utilities, and

¹⁸ SERI also excludes the Sale/Leaseback, discussed below, as well as some Variable Interest Debt, from debt in calculating its capital structure. Pursuant to the Settlement approved by FERC in Docket No. ER89-678 et al., the SLB payments are included in Operating Expense as Rent Expense in Account 931.

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Entergy Corp. in particular. The equity ratios of SERI's customers, the Operating Companies, are in the 46.27% to 53.16% range.¹⁹

	SERI	ELL	EMI	EAI	ENO	Composite	
(a) \$	710,809,187 \$	5,308,344,630 \$	1,198,250,062 \$	2,408,034,210 \$	415,547,667 \$	10,040,985,756 Proprietary Capital (Equity)	FF1 112:16
(b) \$	418,020,805 \$	5,884,017,953 \$	1,283,844,878 \$	2,795,795,941 \$	366,204,635 \$	10,747,884,212 Long-Term Debt	FF1 112:24
(c)	62.97%	47.43%	48.28%	46.27%	53.16%	48.30% Equity Ratio	c=a/(a+b)

Entergy's Corp.'s overall equity ratio, meanwhile, is roughly 36%, as reported by *Value Line* and based on information included on page 53 of the Company's 2017 10-K. The average equity ratio of publicly-traded companies that are, or own, U.S. electric utilities, as classified and covered by *Value Line* is 48.45%.²⁰ Comparable companies to Entergy have equity ratios that average 47.06%.²¹ SERI does not need a high equity ratio. As discussed previously, the risk associated with SERI is significantly less than that of Entergy, or the purchasing companies. Moreover, since equity costs more than debt and carries a tax requirement as well, the use of a reasonable capital structure would lower the overall rate of return and reduce rates.

In *Indiana & Michigan Power Co.*, FERC adjusted the capital structure of a wholly-owned subsidiary nuclear generation company to be other than its book capital structure.²² *Indiana & Michigan Power Co* involved an agreement providing for the sale of all of the power and associated energy of a wholly-owned subsidiary nuclear

¹⁹ See 2017 FERC Form 1 of ELL as filed on 4/16/2018; see also 2017 FERC Form 1 of EAI as filed on 4/16/2018; see also 2017 FERC Form 1 of ENO as filed on 4/16/2018.

²⁰ 2018 Figures as estimated by *Value Line*.

²¹ Id

²² Indiana & Michigan Power Co., 4 F.E.R.C. ¶ 61,316 (1978).

1 generation company to that of its related electric utility operating company. FERC 2

limited the equity ratio of a similar wholly-owned subsidiary Gen. Co. to 35%, finding

3 that:

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[T]his Commission will not accept a subsidiary's book capital structure in developing common equity return absent persuasive evidence that such capital structure is appropriate... We believe that an appropriate approach to the determination of the rate of return in this case would be one based upon the consolidated capital structure and cost of capital of I&M Electric and I&M Power. Because of the dated record, however, we choose not to employ it. In our view, the best alternative capital structure available to us is the one suggested by RP&L and IMMDA, i.e., 65% debt and 35% equity. We feel that such a capital structure is appropriate because: (1) the record reflects that the consolidated common equity ratio of I&M Electric and I&M Power, as of August, 1975, is 34.2%; 5 (2) under the Capital Funds Agreement I&M Electric has agreed to provide I&M Power with sufficient capital contributions to maintain I&M Power's common equity ratio at a minimum of 35%; (3) a 35% common equity ratio is typical in the electric utility industry; and (4) the limited business risks attendant to I&M Power's operations, as discussed below. In imputing a different capital structure to I&M Power than that on its books, it is also necessary to impute additional interest payments and their resultant tax consequences in the cost of service tariff. We therefore direct that the cost of service tariff be calculated pursuant to this Opinion as if I&M Power's capital structure were 65% debt and 35% equity.²³

Utilizing the Commission's reasoning in *Indiana & Michigan Power Co.*, as determined by the consolidated common equity ratios of SERI, ELL, EAI, EMI, and ENO, SERI's equity ratio should be set at 48.30%.²⁴ Alternatively, should the Commission decide to

²³ *Indiana & Michigan Power Co.*, 4 F.E.R.C. ¶ 61,316 (1979).

²⁴Indiana & Michigan Power Co., 4 F.E.R.C. ¶ 61,316 (1979) (stating "We believe that an appropriate approach to the determination of the rate of return in this case would be one based upon the consolidated capital structure.").

- leave SERI's high equity ratio in place, a decision to do so should significantly reduce

 SERI's risk profile, and should lead to a further decreased ROE.
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VI. DEPRECIATION

- 5 Q. IS THERE A RELATED ISSUE ASSOCIATED WITH SERI'S DEPRECIATION
 6 RATES?
- Yes, in Docket No. ER17-2219, SERI made a filing to revise the depreciation rates used to calculate the depreciation and amortization expenses for Grand Gulf, and to update the depreciation rates for use in calculating Grand Gulf's decommissioning cost annual revenue requirement, primarily to reflect a 20-year license extension granted for Grand Gulf by the Nuclear Regulatory Commission in December, 2016. In examining the filing, the parties have learned that SERI employed methods that conflict with FERC and general regulatory precedent in the development of their proposed depreciation rates.
- Q. PLEASE EXPLAIN HOW SERI HAS EMPLOYED DEPRECIATION METHODS
 THAT CONFLICT WITH FERC AND GENERAL REGULATORY
- 16 **PRECEDENT?**
- 17 A. Upon investigation, it was discovered that SERI has included the cost of Sale/Leaseback
 18 capital additions in its depreciation study. These additions are not recoverable via the
 19 formula rate base accounts, and should be excluded from depreciation rates. SERI agreed
 20 with the lessors that capital additions would become the property of the lessors in its

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- initial Sale-Leaseback agreements. In 2015, SERI again leased the property, containing those same capital additions, and is including the lease payments in rates. This is a double recovery for the same capital additions and it is improper to include the costs twice in rates. Thus, they improperly inflate the depreciation rate.
- 5 Q. ARE THERE OTHER ASSUMPTIONS UNDERLYING SERI'S STUDY THAT
 6 SHOULD BE EXCLUDED FROM THE DEVELOPMENT OF RATES?
- 7 Yes, the SERI depreciation study developed rates using the assumption that future A. 8 additions to the plant are recoverable in current depreciation expense. The forecast of 9 future additions is speculative and unsupported. Allowing that recovery of speculative 10 and unsupported future additions in rates would be inconsistent with the regulatory "used 11 and useful" principle. It is also my understanding that regulatory agencies generally do 12 not permit future additions to be included in the development of depreciation rates. The 13 Commission should not allow SERI to include future additions in the development of 14 depreciation rates.
- 15 Q. WERE THERE ANY ASSUMPTIONS RELATED TO REMAINING LIFE
 16 CONTAINED IN SERI'S DEPRECIATION STUDY THAT SHOULD BE
 17 REVISED?
- 18 A. Yes, SERI's depreciation study included forecasts of future "interim retirements," which
 19 was based on an interim retirement history for a limited period, 1998-2016, and included
 20 interim retirements that were needed for an uprate in 2011-12, some of which may not be
 21 likely to recur in the remaining life of Grand Gulf. Including such non-recurring interim

retirements in the development of a forecast of future interim retirements results in artificially-inflated depreciation rates. As such, these, and other non-recurring interim retirements, should be excluded in developing assumptions related to interim retirements underpinning the remaining life of Grand Gulf. Further investigation is required to evaluate which interim retirements are and are not likely to recur during the remaining life of Grand Gulf.

7 Q. HOW DO YOU RECOMMEND THE COMMISSION ADDRESS THESE

8 **ISSUES?**

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9 A. The Commission should set these, and any additional depreciation issues, for hearing, and establish a refund period.

VII. SUMMARY OF FINDINGS AND CONCLUSION

12 Q. PLEASE SUMMARIZE YOUR FINDINGS AND CONCLUSIONS.

1. ALLOWED RETURN ON EQUITY

SERI's existing allowed 10.94% ROE is unjust and unreasonable, as it is excessive by current market standards. The most reasonable and best available estimate of SERI's current cost of equity is not higher than 7.08%. This cost of equity reflects SERI's extremely low risk.

2. CAPITAL STRUCTURE

SERI maintains a capital structure with an extremely high equity ratio consisting of 63% equity and 37% debt, which is out of proportion to a majority of utilities in general, and Entergy Corp. in particular. The Commission should establish a hypothetical capital structure for SERI, with an imputed equity ratio of 49% or less. Alternatively, should the Commission decide to leave SERI's high equity ratio in place, it should further decrease SERI's allowed ROE.

3. DEPRECIATION

The Commission should not allow SERI to include the cost of Sale/Leaseback capital additions in the development of its depreciation rates. The Commission should not allow SERI to include future additions in the development of depreciation rates. The Commission should not allow SERI to include non-recurring interim retirements in the development of remaining life assumptions underpinning depreciation rates.

The Commission should set these, and any additional depreciation issues, for hearing, and establish a refund period.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

19 A. Yes.

AFFIDAVIT

Robert Lane Sisung, being first duly sworn, deposes and says that he is the same Robert Lane Sisung whose Affidavit accompanies this affidavit: that such Affidavit was prepared by him; that he is familiar with the contents thereof; that the facts set forth therein are true and correct to the best of his knowledge, information and belief; and that he does adopt the same as his sworn testimony in this proceeding.

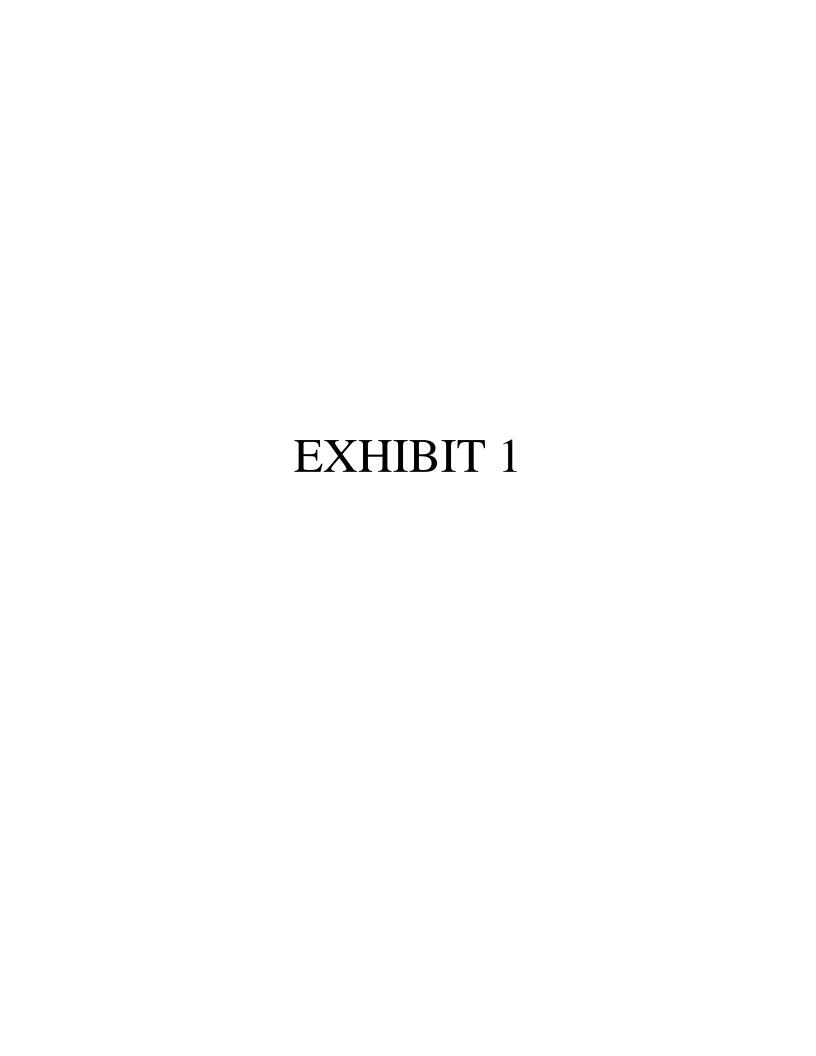
Robert Lane Sisung

Subscribed and sworn before me on this 16

y of April , 2

Notary Public

My Commission Expires: at death.



LPSC U-31894	Application of Entergy Louisiana, LLC for Approval to Securitize Investment Recovery Costs Related to the Little Gypsy Unit 3 Repowering Project Authorizing the Company to Finance its Investment Cost Pursuant to Act 988.
LPSC U-32138	Wastewater Treatment Systems & Operations, LLC: Request for an increase in wastewater rates.
LPSC U-32538	Joint Application of Entergy Louisiana, LLC, Entergy Gulf States Louisiana, L.L.C., Mid South TransCo LLC, Transmission Company 1, LLC, Transmission Company II, LLC, ITC Holdings Corp. and ITC Midsouth LLC for Approval of Change of Ownership of Electric Transmission Business, for Certain Recovery Adjustments, and for related Relief
LPSC U-32707	Application of Entergy Gulf States, Louisiana, L.LC. for authority to Change Rates, Approval of Formula Rate Plan and for Related Relief
LPSC U-32708	Application of Entergy Louisiana, LLC for authority to Change Rates, Approval of Formula Rate Plan and for Related Relief
LPSC U-33244	Potential Business Combination of Entergy Louisiana, LLC and Entergy Gulf States Louisiana L.LC.
LPSC U-33434	Joint Application of Cleco Power, LLC and Cleco Partners L.P. for : (i) Authorization of the Change of Ownership and Control of Cleco Power LLC and (ii) Expedited Treatment
LPSC U-33510	Application for Entergy Gulf States Louisiana, L.L.C. For Approval To Purchase Power Blocks Three and Four of the Union Power Station and Request for Timely Treatment and Cost Recovery
LPSC U-33605	Joint Application of Entergy Gulf States Louisiana L.L.C. and Entergy Louisiana LLC for Certification of the Louisiana Economic Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013
LPSC U-33645	Application of Entergy Gulf States Louisiana L.L.C. for Certification of the Lake Charles Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013
LPSC U-33782	Entergy Louisiana, LLC and Entergy Gulf States Louisiana L.L.C. In Re: Test Year 2014 Formula Rate Plan Filing
LPSC U-33848	Cleco Power LLC Formula Rate Plan June 2015 Monitoring Report

LPSC U-33925	In re: Atmos Entergy Trans Louisiana Rate Stabilization Clause ("RSC") Cost of Service Schedules and Workpapers Test Year Ending September 30, 2015
LPSC U-33974	Entergy Gulf States Louisiana, L.L.C. Test Year 2015 Rate Stabilization Plan Filing
LPSC U-33983	In Re: Motion for Extension of Entergy Louisiana, LLC's Gas Rate Stabilization Plan
LPSC U-34028	Atmos Energy Corporation 2015 Rate Stabilization Clause filing for Louisiana Gas Service Rate Division
LPSC U-34081	Entergy Louisiana, LLC Test Year 2015 Formula Rate Plan Filing
LPSC U-34289	Cleco Power LLC Formula Rate Plan – June 2016 Monitoring Report and pursuant to U-32507 Prudence Review of Cleco's Installation of MATS Emissions Control Equipment at Dolet hills Power Station, Rodemacher Power Station Unit No. 2, and Madison Unit No. 3
LPSC U-34332	Commission Directive to Review Entergy's Load Shedding Agreement with Vinton Power Pubic Authority
LPSC U-34343	In re: Atmos Entergy Trans Louisiana Rate Stabilization Clause ("RSC") Cost of Service Schedules and Workpapers Test Year Ending September 30, 2016
LPSC U-34354	Southwestern Electric Power Company's Request for Certification of Long Term Natural Gas Contract
LPSC U-34376	Entergy Louisiana, LLC ex parte. IN Re: 2016 Rate Stabilization Plan Filing
LPSC U-34424	Atmos Energy Corporation 2015 Rate Stabilization Clause filing for Louisiana Gas Service Rate Division
LPSC U-34445	Entergy Louisiana, LLC's Application for Authorization to Recover Gas Storm Deferred Operations and Maintenance Expense Resulting from the August 2016 Flood
LPSC U-34475	Entergy Louisiana, LLC Test Year 2015 Formula Rate Plan Filing
LPSC U-34617	Application of Cleco Power LLC requesting Commission consideration of a Proposed Physical Bilateral Hedge Program, pursuant to General Order R-32975

LPSC U-34317	Application of Entergy Louisiana, LLC for Authorization to Extend the Midcontinent Independent System Operating Cost Recovery Mechanism
LPSC U-33950	Compliance Submission Regarding Deactivation of Little Gypsy 1, Ninemile 3, and Willow Glen 2 and 4, as required by Order No. U-33510
LPSC U-34447	Application of Entergy Louisiana, LLC Regarding Continued Participation in the Midcontinent Independent System Operator, Inc. Regional Transmission Organization
LPSC U-34501	Application of Cleco Power LLC Regarding the Costs and Benefits of Continued Participation in the Midcontinent Independent System Operator, Inc. Regional Transmission Organization
LPSC U-34445	Entergy Louisiana, LLC 's Application for Authorization to Recover Gas Storm Deferred Operation & Maintenance Expense Resulting/ram the August 2016 Flood
LPSC X-34109	Entergy Louisiana LLC and Entergy Gulf States Louisiana L.L.C. Fuel Adjustment Clause Audit for 2014 through 2015
LPSC X-34345	Investigation of the Meter Reading, Billing, Collection and Customer-Service practices of the Greater Ouachita Water Company and through its operating contractor Severn Trent Environmental Services, for the year 2016
LPSC X-34324	Audit of Purchased Gas Adjustment Filings for Trans Louisiana Gas Company and Louisiana Gas Service Company (Regulatory Divisions of Atmos Energy Corporation) for the period of April 2014 through March 2016
LPSC X-34341	Audit of Fuel Adjustment Clause Filing for Entergy Louisiana LLC for the Period of January 2014 through December 2015.
LPSC I-33013	Integrated Resource Planning ("IRP") Process for Southwestern Electric Power Company (SWEPCO), Pursuant to General Order dated April 20, 2012
LPSC R-26968	Review of the General Order Dated March 12, 1999 (Pole Attachments)
LPSC R-32975	Examination of Long-Term Natural Gas Hedging Proposals.
LPSC R-34026	Investigation of Double Leveraging Issues for all LPSC-Jurisdictional Utilities

LPSC R-34029	Investigation of Tax Structure Issues for all LPSC-Jurisdictional Utilities
LPSC R-34407	Rulemaking Docket to Consider Whether or Not the Commission Should Exercise Authority Over Future Utility Generation Deactivation and Retirement Decisions and the Rules and Procedures that Could Apply to Any Such Exercise of Authority
LPSC S-33825	Directive to Establish a Service Quality Program (SQP) for Cleco Power, LLC
LPSC S-34082	Entergy Louisiana, LLC Request to Close LMPS Rate Schedule to New Business
LPSC S-34426	Status of Electric Rates in Louisiana: Where Are We and Where Are We Going?
LPSC U-34447	Application of Entergy Louisiana, LLC Regarding Continued Participation in the Midcontinent Independent System Operator, Inc. Regional Transmission Organization
LPSC I-33013	Integrated Resource Planning ("IRP") process for Southwestern Electric Power Company (SWEPCO), pursuant to General Order dated April 20, 2012
LPSC I-34693	Cleco Power, LLC, ex parte. In re: Request to Initiate 2017 Integrated Resource Planning ("IRP") Process Pursuant to General Order No. R-30021 (Corrected) dated April 20, 2012
LPSC I-34694	Entergy Louisiana, LLC, ex parte. In re: Request to Initiate 2017 Integrated Resource Planning ("IRP") Process Pursuant to General Order No. R-30021 (Corrected) dated April 20, 2012
LPSC U-34742	Community Utilities of Louisiana Inc. and Utilities, Inc. of Louisiana - Request for Statewide Consolidation of Assets, Request for Uniform Rate Structure, Request for the Establishment of Formula Rate Plan, and Application for Adjustment in Retail Rates Pursuant to the Global Settlement Agreement Contained in LPSC Order Nos. U-34206 and U-34287, as well as Reservation of Rights to Request Interim Rates

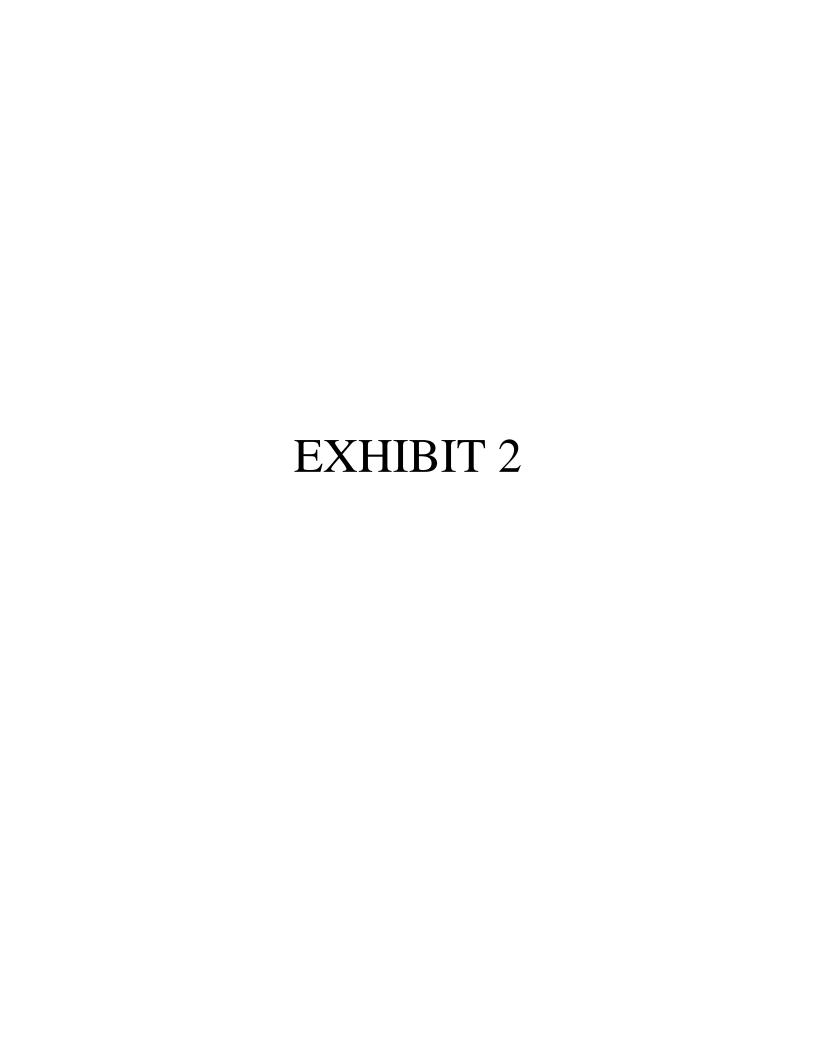
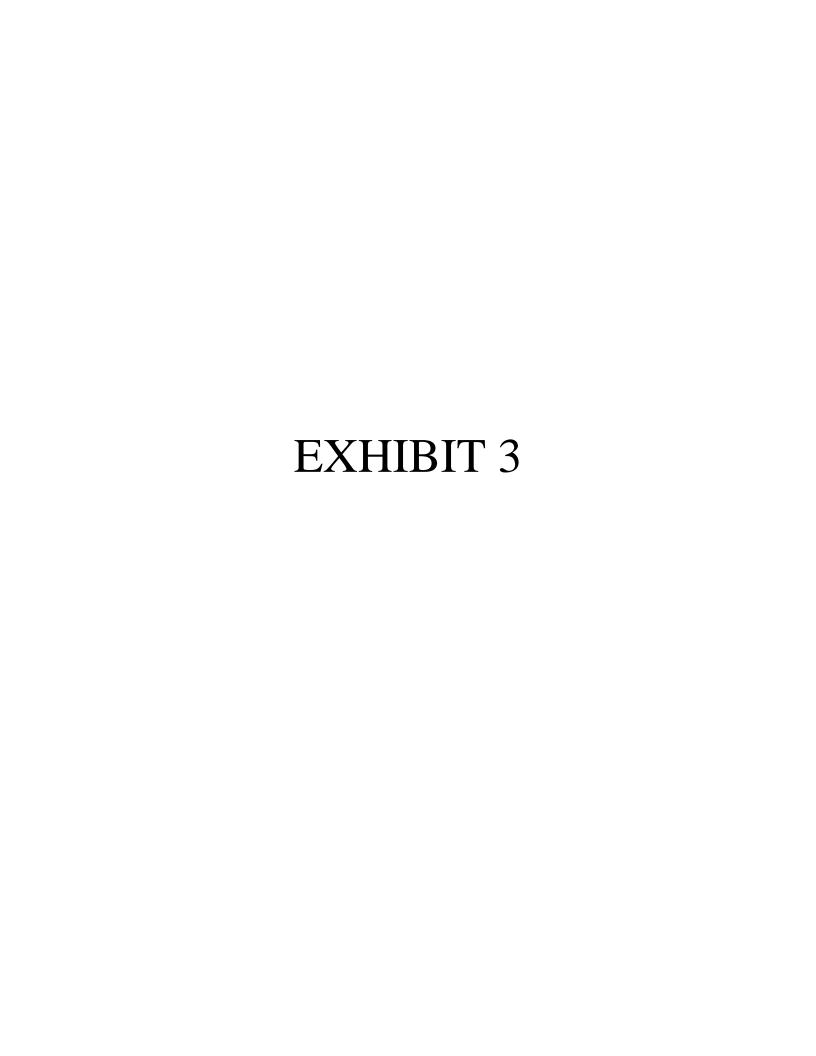


Exhibit 2 Value Line Investment Survey

	Moody's Credit	S&P Credit			
Company	Rating	Rating			
Allete	A3	BBB+			
Alliant Energy	Baa1	A-			
Ameren	Baa1	BBB+			
American Electric	Baa1	A-			
Avangrid	Baa1	BBB+			
Avista	Baa1	BBB			
Black Hills	Baa2	BBB			
Centerpoint	Baa1	A-			
CMS Energy	Baa1	BBB+			
Con Edison	A3	A-			
DTE Energy	Baa1	BBB+			
Dominion	Baa2	BBB+			
Duke Energy	Baa1	A-			
Edison Intern.	A3	BBB+			
El Paso Electric	Baa1	BBB			
Entergy	Baa2	BBB+			
Eversource Energy	Baa1	A+			
Exelon	Baa2	BBB			
FirstEnergy	Baa3	BBB-			
Great Plains Energ	Baa2	BBB+			
Hawaiian Electric		BBB-			
IDACORP	Baa1	BBB			
MGE Energy		AA-			
NextEra Energy	Baa1	A-			
Northwestern	Baa1	BBB			
OGE Energy	A3	A-			
Otter Tail	Baa2	BBB			
PG&E	A3	BBB+			
Pinnacle West	A3	A-			
PNM Resources	Baa3	BBB+			
Portland General	A3	BBB			
PPL	Baa2	A-			
PS Enterprise	Baa1	BBB+			
SCANA	Ba1	BBB			
Sempra Energy	Baa1	BBB+			
Southern Co.	Baa2	A-			
Vectren		A-			
WEC Energy Grou	A3	A-			
Westar Energy	Baa1	BBB+			
Xcel Energy	A3	A-			

Mo	ody's	S&P				
Long-term	Short-term	Long-term	Short-term			
Aaa		AAA				
Aal		AA+	A-1+			
Aa2	P-1	AA	A-1			
Aa3	1-1	AA-				
A1		A+	A-1			
A2		A	Α-1			
A3	P-2	A-				
Baa1	1 -2	BBB+	A-2			
Baa2	P-3	BBB				
Baa3	1-3	BBB-	A-3			
Ba1		BB+				
Ba2		BB				
Ba3		BB-	В			
B1		B+	ь			
B2		В				
В3		В-				
Caa1	Not Prime	CCC+				
Caa2	Not Prime	CCC				
Caa3		CCC-	C			
G.		CC				
Ca		C				
C		RD				
/		SD	D			
/		D				

	Moody's Credit	S&P Credit
Company	Rating	Rating
SERI	Baa1	BBB+



	September <u>Dividend</u>	October <u>Dividend</u>	November <u>Dividend</u>	December Dividend	January <u>Dividend</u>	February <u>Dividend</u>	Date of Change	September Div. Yield	October Div. Yield	November Div. Yield	December Div. Yield	January <u>Div. Yield</u>	February Div. Yield	6 Month Avg. Div. Yield
Allete	2.14	2.14	2.14	2.14	2.14	2.24	Wednesday, February 14, 2018	2.74%	2.74%	2.74%	2.78%	2.94%	3.22%	2.86%
Alliant Energy	1.26	1.26	1.26	1.26	1.344	1.344	Tuesday, January 30, 2018	2.97%	2.96%	2.85%	2.88%	3.29%	3.50%	3.08%
Ameren	1.76	1.76	1.76	1.83	1.83	1.83	Tuesday, December 12, 2017	2.97%	2.94%	2.79%	2.98%	3.21%	3.37%	3.04%
American Electric	2.36	2.36	2.48	2.48	2.48	2.48	Thursday, November 9, 2017	3.27%	3.27%	3.27%	3.28%	3.53%	3.75%	3.40%
Avangrid	1.728	1.728	1.728	1.728	1.728	1.728		3.63%	3.49%	3.37%	3.34%	3.51%	3.62%	3.49%
Avista	1.43	1.43	1.43	1.43	1.43	1.492	Thursday, February 22, 2018	3.53%	3.35%	3.24%	3.40%	3.40%	3.71%	3.44%
Black Hills	1.78	1.78	1.9	1.9	1.9	1.9	Thursday, November 16, 2017	2.56%	2.66%	3.09%	3.23%	3.37%	3.57%	3.08%
CMS Energy	1.33	1.33	1.33	1.33	1.33	1.432	Thursday, February 15, 2018	2.80%	2.81%	2.70%	2.74%	2.92%	3.35%	2.89%
Centerpoint	1.03	1.03	1.03	1.03	1.03	1.03		3.47%	3.52%	3.54%	3.56%	3.71%	3.80%	3.60%
Con Edison	2.76	2.76	2.76	2.76	2.76	2.86	Tuesday, February 13, 2018	3.32%	3.31%	3.16%	3.17%	3.39%	3.69%	3.34%
DTE Energy	3.3	3.3	3.3	3.53	3.53	3.53	Friday, December 15, 2017	3.00%	3.01%	2.92%	3.15%	3.31%	3.46%	3.14%
Dominion	3.02	3.02	3.08	3.08	3.08	3.08	Thursday, November 30, 2017	3.87%	3.83%	3.75%	3.72%	3.95%	4.12%	3.87%
Duke Energy	3.56	3.56	3.56	3.56	3.56	3.56		4.14%	4.14%	3.97%	4.11%	4.42%	4.67%	4.24%
Edison Intern.	2.172	2.172	2.172	2.42	2.42	2.42	Thursday, December 28, 2017	2.74%	2.76%	2.68%	3.35%	3.87%	3.87%	3.21%
El Paso Electric	1.34	1.34	1.34	1.34	1.34	1.34		2.42%	2.35%	2.30%	2.32%	2.52%	2.67%	2.43%
Entergy	3.48	3.48	3.56	3.56	3.56	3.56	Wednesday, November 8, 2017	4.45%	4.30%	4.12%	4.27%	4.46%	4.72%	4.39%
Eversource Energy	1.9	1.9	1.9	1.9	1.9	1.9		3.06%	3.10%	2.97%	2.97%	3.04%	3.18%	3.05%
Exelon	1.31	1.31	1.31	1.31	1.31	1.38	Wednesday, February 14, 2018	3.49%	3.36%	3.19%	3.24%	3.38%	3.72%	3.40%
FirstEnergy	1.44	1.44	1.44	1.44	1.44	1.44		4.60%	4.52%	4.27%	4.46%	4.54%	4.49%	4.48%
Great Plains Energy	1.1	1.1	1.1	1.1	1.1	1.1		3.60%	3.48%	3.28%	3.31%	3.51%	3.69%	3.48%
Hawaiian Electric	1.24	1.24	1.24	1.24	1.24	1.24		3.65%	3.55%	3.34%	3.33%	3.55%	3.75%	3.53%
IDACORP	2.2	2.2	2.36	2.36	2.36	2.36	Friday, November 3, 2017	2.45%	2.43%	2.48%	2.49%	2.72%	2.84%	2.57%
MGE Energy	1.292	1.292	1.292	1.292	1.292	1.292		1.99%	1.96%	1.97%	2.02%	2.12%	2.30%	2.06%
NextEra Energy	3.93	3.93	3.93	3.93	3.93	4.44	Monday, February 26, 2018	2.65%	2.60%	2.55%	2.52%	2.55%	2.91%	2.63%
Northwestern	2.1	2.1	2.1	2.1	2.1	2.1		3.57%	3.62%	3.42%	3.42%	3.72%	4.02%	3.63%
OGE Energy	1.212	1.332	1.332	1.332	1.332	1.332	Friday, October 6, 2017	3.36%	3.68%	3.71%	3.88%	4.18%	4.25%	3.84%
Otter Tail	1.28	1.28	1.28	1.28	1.28	1.34	Wednesday, February 14, 2018	2.97%	2.83%	2.75%	2.78%	3.14%	3.25%	2.95%
PG&E	2.12	2.12	2.12	2.12	2.12	2.12		3.05%	3.55%	3.84%	4.40%	4.88%	5.03%	4.13%
Pinnacle West	2.62	2.78	2.78	2.78	2.78	2.78	Tuesday, October 31, 2017	3.00%	3.21%	3.11%	3.15%	3.39%	3.60%	3.24%
PNM Resources	0.97	0.97	0.97	0.97	1.06	1.06	Wednesday, January 17, 2018	2.33%	2.31%	2.21%	2.26%	2.80%	2.95%	2.48%
Portland General	1.36	1.36	1.36	1.36	1.36	1.36	, , , , , ,	2.90%	2.93%	2.80%	2.87%	3.12%	3.32%	2.99%
PPL	1.58	1.58	1.58	1.58	1.58	1.58		4.08%	4.18%	4.32%	4.67%	5.02%	5.22%	4.58%
PS Enterprise	1.72	1.72	1.72	1.72	1.72	1.72		3.74%	3.59%	3.36%	3.31%	3.44%	3.50%	3.49%
SCANA	2.45	2.45	2.45	2.45	2.45	2.45		4.49%	5.27%	5.57%	5.91%	5.60%	6.48%	5.55%
Sempra Energy	3.29	3.29	3.29	3.29	3.29	3.29		2.82%	2.89%	2.75%	2.90%	3.09%	3.10%	2.93%
Southern Co.	2.32	2.32	2.32	2.32	2.32	2.32		4.70%	4.58%	4.45%	4.64%	5.09%	5.29%	4.79%
Vectren	1.68	1.68	1.8	1.8	1.8	1.8		2.52%	2.50%	2.70%	2.68%	2.88%	2.95%	2.70%
WEC Energy Group	2.08	2.08	2.08	2.08	2.08	2.212	Tuesday, February 13, 2018	3.21%	3.18%	3.04%	3.08%	3.22%	3.58%	3.22%
Westar Energy	1.6	1.6	1.6	1.6	1.6	1.6		3.18%	3.08%	2.91%	2.92%	3.10%	3.24%	3.07%
Xcel Energy	1.44	1.44	1.44	1.44	1.44	1.44		2.96%	2.98%	2.85%	2.90%	3.09%	3.30%	3.01%

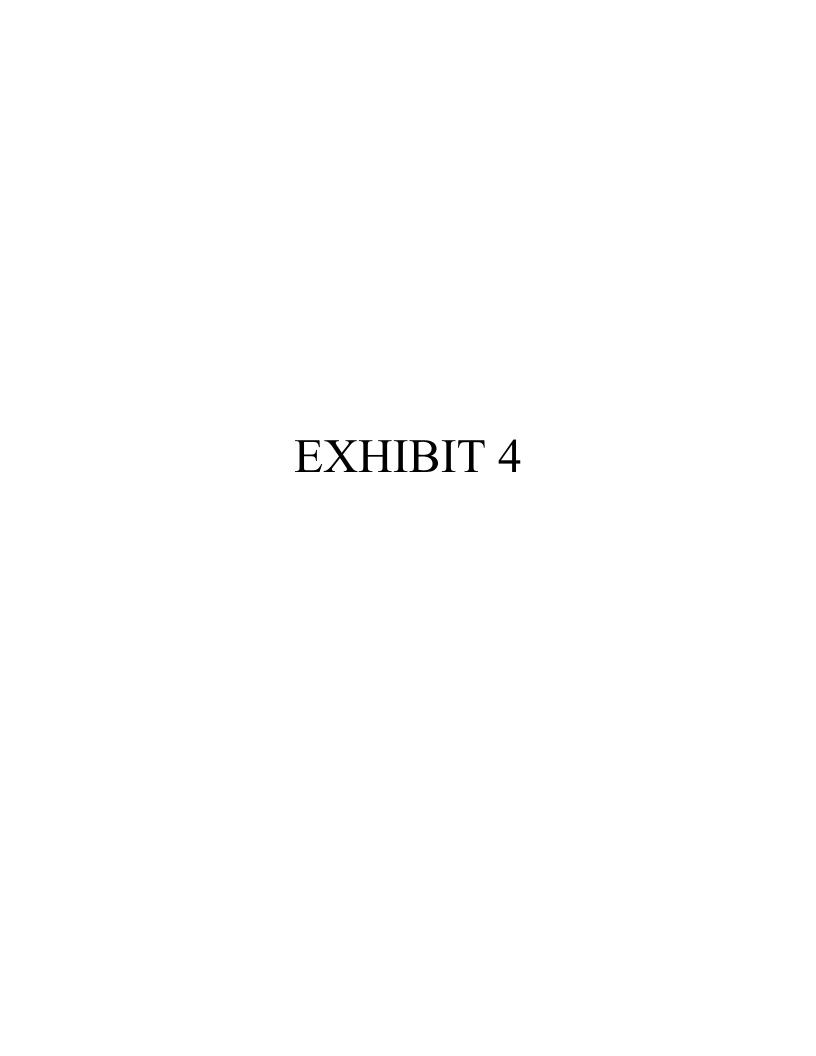


Exhibit 4 Long-Term Growth Rates

GDP GROWTH RATES							
SSA	4.392%						
EIA	4.37%						
IHS Global Insight	4.09%						
	4.28%						

						DERAL OLD-AC DERAL DISABI						
					T	RUST FUNDS						
			Tab	le VI.G4.—OAS	SDI and HI Ann	ual and Summar	ized Income, Co	st, and Balance				
as a Percentage of GDP, Calendar Years 2017-2095												
2023	4.78	5.32	-0.54	1.6	1.67	-0.07	6.38	6.99	-0.61	26,078		
2024	4.78	5.42	-0.64	1.61	1.7	-0.09	6.39	7.12	-0.73	27,242		
2025	4.78	5.51	-0.73	1.62	1.73	-0.11	6.4	7.24	-0.84	28,458		
2026	4.79	5.6	-0.81	1.63	1.79	-0.16	6.42	7.4	-0.98	29,707		
2030	4.78	5.9	-1.12	1.66	1.9	-0.24	6.44	7.8	-1.36	35,314		
2035	4.77	6.1	-1.33	1.69	2.03	-0.34	6.45	8.13	-1.68	43,718		
2040	4.75	6.08	-1.33	1.71	2.11	-0.4	6.45	8.18	-1.73	54,260		
2045	4.73	5.97	-1.24	1.72	2.14	-0.42	6.45	8.11	-1.66	67,488		
2050	4.71	5.9	-1.19	1.74	2.14	-0.4	6.46	8.04	-1.58	83,787		
2055	4.7	5.9	-1.2	1.77	2.12	-0.35	6.47	8.03	-1.56	103,729		
2055	4.7	5.9	-1.2	1.77	2.12	-0.35	6.47	8.03	-1.56	103,729		
2060	4.69	5.96	-1.27	1.79	2.11	-0.32	6.49	8.07	-1.58	128,183		
2065	4.68	6.02	-1.34	1.82	2.12	-0.3	6.5	8.14	-1.64	158,326		
2070	4.66	6.08	-1.42	1.84	2.15	-0.31	6.5	8.23	-1.73	195,725		
2073										223,636		
2075	4.65	6.12	-1.47	1.85	2.17	-0.32	6.5	8.29	-1.79	242,244		
							C	ompounded Gro	wth Factor	4.39%		

Source: U.S. Energy Information Administration

full name api key units	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Real Gross D Macroeconom 18-AEO2018. billion 2009 \$	\$ 16,716.15 \$	17,074.88 \$	17,501.40 \$	17,928.92 \$	18,334.91 \$	18,719.17 \$	19,122.58 \$	19,495.44 \$	19,852.30 \$	20,220.68
GDP Chain-t Macroeconom 18-AEO2018. 2009=1.000	1.11	1.13	1.16	1.19	1.22	1.25	1.28	1.31	1.34	1.37
							\$	25,515.99		

EIA 2018 AEO Macroeconomic Indicators

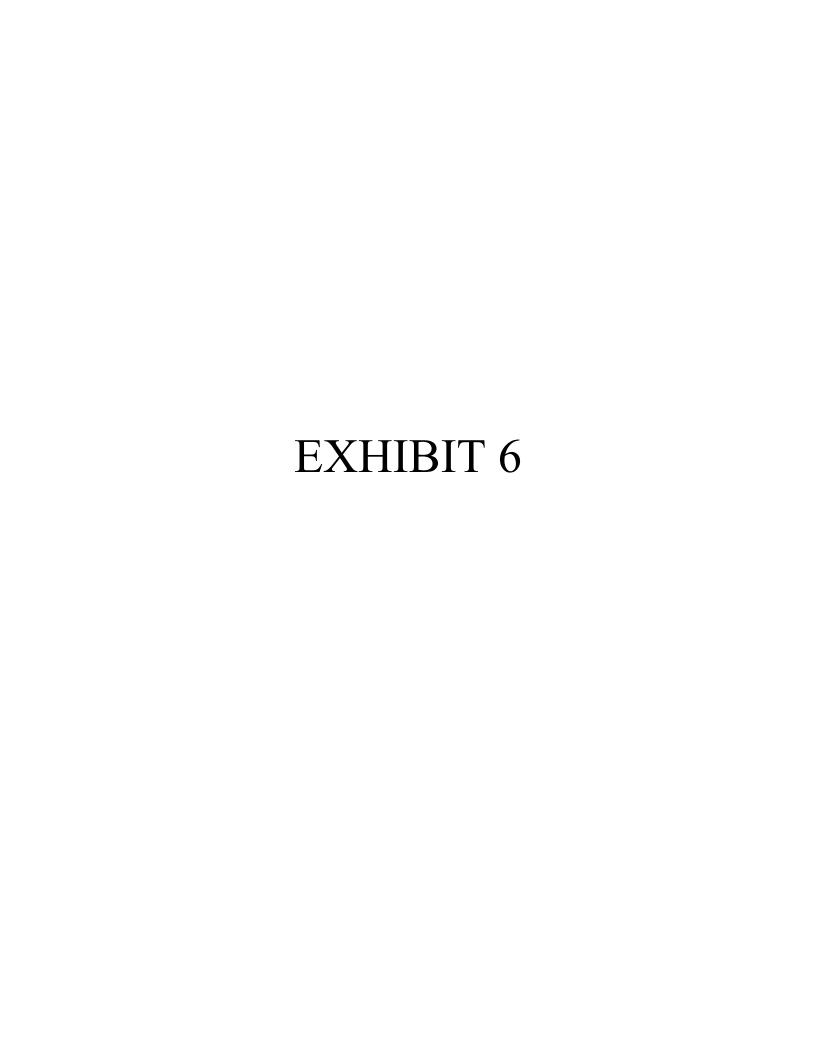
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_	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
\$	20,609.19 \$	21,038.79 \$	21,493.27 \$	21,953.88 \$	22,420.91 \$	22,896.14 \$	23,368.68 \$	23,833.41 \$	24,314.87 \$	24,801.54 \$	25,298.80 \$	25,795.58 \$	26,290.10
	1.40	1.44	1.47	1.50	1.53	1.56	1.60	1.63	1.67	1.71	1.75	1.79	1.83

 2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	Growth (2017-2050)	
\$ 26,809.55 \$	27,355.55 \$	27,910.40 \$	28,471.35 \$	29,052.35 \$	29,626.01 \$	30,204.05 \$	30,785.29 \$	31,403.54 \$	31,998.24 \$	32,583.68	33,204.81		2.00%
1.87	1.91	1.96	2.00	2.05	2.10	2.15	2.21	2.26	2.32	2.38	2.44		0.02
										5	80,911.35		
	Beginning Nominal GDP							5	25,515.99				
Ending Nominal GDP								5	80,911.35				
					Number of Periods						27		
						Compounded Nominal Growth Factor				_	4.37%	•	



						Exhibit 5	Value Line Inves	tment Surv	ey Two-S	tep DCF A	Analysis R	<u>lesults</u>							
	September Dividend	October Dividend	November Dividend	December Dividend	January <u>Dividend</u>	February Dividend	Date of Change	September Div. Yield	October Div. Yield	November Div. Yield	December Div. Yield	January Div. Yield	February Div. Yield	6 Month Avg. Div. Yield	IBES Growth	GDP Growth	Weighted Growth	Adjusted Div. Yield	DCF Estimate
Allete	2.14	2.14	2.14	2.14	2.14	2.24	Wednesday, February 14, 2018	2.74%	2.74%	2.74%	2.78%	2.94%	3.22%	2.86%	5.00%	4.28%	4.76%	2.93%	7.69%
Alliant Energy	1.26	1.26	1.26	1.26	1.344	1.344	Tuesday, January 30, 2018	2.97%	2.96%	2.85%	2.88%	3.29%	3.50%	3.08%	5.45%	4.28%	5.06%	3.15%	8.219
Ameren	1.76	1.76	1.76	1.83	1.83	1.83	Tuesday, December 12, 2017	2.97%	2.94%	2.79%	2.98%	3.21%	3.37%	3.04%	6.40%	4.28%	5.69%	3.13%	8.829
American Electric	2.36	2.36	2.48	2.48	2.48	2.48	Thursday, November 9, 2017	3.27%	3.27%	3.27%	3.28%	3.53%	3.75%	3.40%	5.18%	4.28%	4.88%	3.48%	8.36%
Avangrid	1.728	1.728	1.728	1.728	1.728	1.728		3.63%	3.49%	3.37%	3.34%	3.51%	3.62%	3.49%	10.70%	4.28%	8.56%	3.64%	12.209
Avista	1.43	1.43	1.43	1.43	1.43	1.492	Thursday, February 22, 2018	3.53%	3.35%	3.24%	3.40%	3.40%	3.71%	3.44%	5.65%	4.28%	5.19%	3.53%	8.72
Black Hills	1.78	1.78	1.9	1.9	1.9	1.9	Thursday, November 16, 2017	2.56%	2.66%	3.09%	3.23%	3.37%	3.57%	3.08%	3.50%	4.28%	3.76%	3.14%	6.90
CMS Energy	1.33	1.33	1.33	1.33	1.33	1.432	Thursday, February 15, 2018	2.80%	2.81%	2.70%	2.74%	2.92%	3.35%	2.89%	7.04%	4.28%	6.12%	2.97%	9.10
Centerpoint	1.03	1.03	1.03	1.03	1.03	1.03		3.47%	3.52%	3.54%	3.56%	3.71%	3.80%	3.60%	7.62%	4.28%	6.51%	3.72%	10.22
Con Edison	2.76	2.76	2.76	2.76	2.76	2.86	Tuesday, February 13, 2018	3.32%	3.31%	3.16%	3.17%	3.39%	3.69%	3.34%	3.11%	4.28%	3.50%	3.40%	6.90
OTE Energy	3.3	3.3	3.3	3.53	3.53	3.53	Friday, December 15, 2017	3.00%	3.01%	2.92%	3.15%	3.31%	3.46%	3.14%	5.58%	4.28%	5.15%	3.22%	8.37
Dominion	3.02	3.02	3.08	3.08	3.08	3.08	Thursday, November 30, 2017	3.87%	3.83%	3.75%	3.72%	3.95%	4.12%	3.87%	5.83%	4.28%	5.31%	3.98%	9.29
Duke Energy	3.56	3.56	3.56	3.56	3.56	3.56		4.14%	4.14%	3.97%	4.11%	4.42%	4.67%	4.24%	3.43%	4.28%	3.71%	4.32%	8.03
Edison Intern.	2.172	2.172	2.172	2.42	2.42	2.42	Thursday, December 28, 2017	2.74%	2.76%	2.68%	3.35%	3.87%	3.87%	3.21%	2.99%	4.28%	3.42%	3.27%	6.69
El Paso Electric	1.34	1.34	1.34	1.34	1.34	1.34		2.42%	2.35%	2.30%	2.32%	2.52%	2.67%	2.43%	5.20%	4.28%	4.89%	2.49%	7.38
Entergy	3.48	3.48	3.56	3.56	3.56	3.56	Wednesday, November 8, 2017	4.45%	4.30%	4.12%	4.27%	4.46%	4.72%	4.39%	-6.67%	4.28%	-3.02%	4.32%	1.30
Eversource Energy	1.9	1.9	1.9	1.9	1.9	1.9		3.06%	3.10%	2.97%	2.97%	3.04%	3.18%	3.05%	5.65%	4.28%	5.19%	3.13%	8.33
Exelon	1.31	1.31	1.31	1.31	1.31	1.38	Wednesday, February 14, 2018	3,49%	3.36%	3.19%	3.24%	3.38%	3.72%	3,40%	3.19%	4.28%	3.55%	3,46%	7.0
irstEnergy	1.44	1.44	1.44	1.44	1.44	1.44	**	4.60%	4.52%	4.27%	4.46%	4.54%	4.49%	4.48%	-4.74%	4.28%	-1.73%	4.44%	2.7
Freat Plains Energy	1.1	1.1	1.1	1.1	1.1	1.1		3,60%	3.48%	3.28%	3.31%	3.51%	3.69%	3,48%	6.00%	4.28%	5.43%	3.57%	9.0
Iawaiian Electric	1.24	1.24	1.24	1.24	1.24	1.24		3,65%	3,55%	3.34%	3,33%	3,55%	3,75%	3,53%	8.50%	4.28%	7.09%	3,65%	10.7
DACORP	2.2	2.2	2.36	2.36	2.36	2.36	Friday, November 3, 2017	2,45%	2.43%	2.48%	2,49%	2.72%	2.84%	2.57%	3.10%	4.28%	3,49%	2.61%	6.1
MGE Energy	1.292	1.292	1.292	1.292	1.292	1.292	**	1.99%	1.96%	1.97%	2.02%	2.12%	2.30%	2.06%	4.00%	4.28%	4.09%	2.10%	6.20
NextEra Energy	3.93	3.93	3,93	3.93	3,93	4.44	Monday, February 26, 2018	2,65%	2,60%	2.55%	2.52%	2.55%	2.91%	2,63%	8.85%	4.28%	7.33%	2.73%	10.0
Northwestern	2.1	2.1	2.1	2.1	2.1	2.1	3, 3, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	3.57%	3.62%	3.42%	3.42%	3.72%	4.02%	3.63%	3.12%	4.28%	3.51%	3.69%	7.2
OGE Energy	1.212	1.332	1.332	1.332	1.332	1.332	Friday, October 6, 2017	3.36%	3.68%	3.71%	3,88%	4.18%	4.25%	3.84%	5.80%	4.28%	5.29%	3.95%	9.2
Otter Tail	1.28	1.28	1.28	1.28	1.28	1.34	Wednesday, February 14, 2018	2.97%	2.83%	2.75%	2.78%	3.14%	3.25%	2,95%	9.00%	4.28%	7.43%	3.06%	10.49
PG&E	2.12	2.12	2.12	2.12	2.12	2.12		3.05%	3.55%	3.84%	4.40%	4.88%	5.03%	4.13%	4.50%	4.28%	4.43%	4.22%	8.64
Pinnacle West	2.62	2.78	2.78	2.78	2.78	2.78	Tuesday, October 31, 2017	3,00%	3.21%	3.11%	3.15%	3,39%	3.60%	3.24%	3.63%	4.28%	3,85%	3.30%	7.15
NM Resources	0.97	0.97	0.97	0.97	1.06	1.06	Wednesday, January 17, 2018	2.33%	2.31%	2.21%	2.26%	2.80%	2.95%	2.48%	5.80%	4.28%	5.29%	2.54%	7.8
ortland General	1.36	1.36	1.36	1.36	1.36	1.36	,,,	2.90%	2.93%	2.80%	2.87%	3.12%	3.32%	2.99%	2.70%	4.28%	3,23%	3.04%	6.2
PL	1.58	1.58	1.58	1.58	1.58	1.58		4.08%	4.18%	4.32%	4.67%	5.02%	5.22%	4.58%	2.14%	4.28%	2.85%	4.64%	7.5
S Enterprise	1.72	1.72	1.72	1.72	1.72	1.72		3.74%	3.59%	3.36%	3.31%	3.44%	3.50%	3,49%	3.39%	4.28%	3.69%	3.56%	7.2
CANA	2.45	2.45	2.45	2.45	2,45	2.45		4.49%	5.27%	5.57%	5.91%	5.60%	6.48%	5,55%	4.00%	4.28%	4.09%	5,67%	9.7
empra Energy	3.29	3.29	3.29	3.29	3.29	3.29		2.82%	2.89%	2.75%	2.90%	3.09%	3.10%	2.93%	9.85%	4.28%	7.99%	3.04%	11.0
outhern Co.	2.32	2.32	2.32	2.32	2.32	2.32		4.70%	4.58%	4.45%	4.64%	5.09%	5.29%	4.79%	2.17%	4.28%	2.87%	4.86%	7.7
ectren	1.68	1.68	1.8	1.8	1.8	1.8		2.52%	2.50%	2.70%	2.68%	2.88%	2.95%	2.70%	6.50%	4.28%	5.76%	2.78%	8.5
VEC Energy Group	2.08	2.08	2.08	2.08	2.08	2.212	Tuesday, February 13, 2018	3.21%	3.18%	3.04%	3.08%	3.22%	3,58%	3.22%	4.34%	4.28%	4.32%	3.29%	7.6
Vestar Energy	1.6	1.6	1.6	1.6	1.6	1.6	rucsuay, reordary 13, 2018	3.18%	3.08%	2.91%	2.92%	3.10%	3.24%	3.07%	2.80%	4.28%	3.29%	3.12%	6.4
cel Energy	1.44	1.44	1.44	1.44	1.44	1.44		2.96%	2.98%	2.85%	2.90%	3.09%	3.30%	3.01%	6.15%	4.28%	5.53%	3.10%	8.6
ecci Energy	1.44	1.44	1.44	1.77	1.77	1.44		2.7070	2.7070	2.0570	2.7070	3.0770	3.3070	5.0170	0.1570	4.2070	5.5570	3.1070	0.02
																Median 25th Percentile 75th Percentile Midpoint Max Min			8.1: 7.0: 9.0' 6.7: 12.2: 1.3:



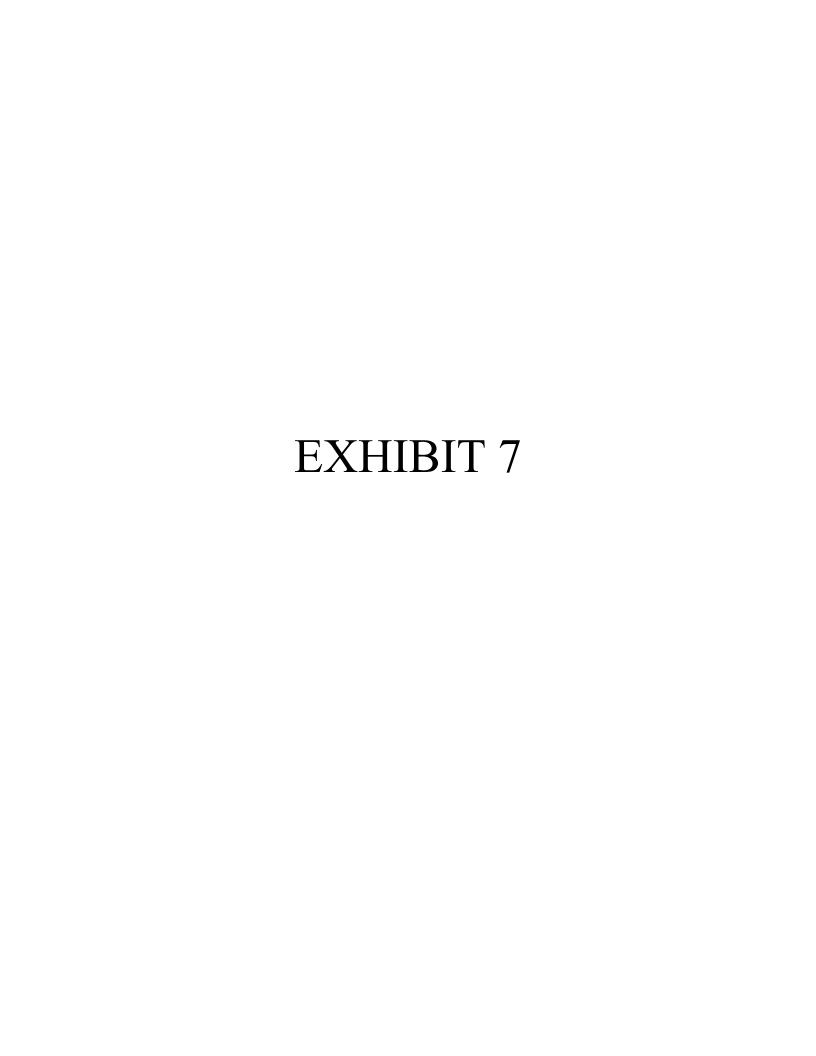
LONG TERM GROWTH IBES ESTIMATES

Earnings per Share, Long Term Growth (%) Source Thomson Reuters Serviced by Alacra On Demand on 2018-03-06

Ticker	Company Name	EPS Long Growth Estimates	Analysts	Last Known LTG Estimates		Estimate Date	Conf Date	irmed	Exclusion Date	Notes
ALE	ALLETE, Inc.	-	1	5.00	0%	19-Jun-16	6	15-Feb-17	14-Aug-17	Contributor update pending: Estimate failed freshness policy
LNT	Alliant Energy Corporation	5.45%	2							
AEE	Ameren Corporation	6.40%	2							
AEP	American Electric Power Company, Inc.	5.63%	2							
AGR	Avangrid, Inc.	8.50%	4							
AVA	Avista Corporation	-	2	5.65	5%	3-Nov-16	ò	8-Nov-16	7-May-17	Contributor update pending: Estimate failed freshness policy
BKH	Black Hills Corporation	3.50%	3							
CMS	CMS Energy Corporation	7.04%	4							
CNP	CenterPoint Energy, Inc.	7.62%	4							
ED	Consolidated Edison, Inc.	3.11%	3							
DTE	DTE Energy Company	5.58%	4							
D	Dominion Resources, Inc.	6.86%	3							
DUK	Duke Energy Corporation	4.24%	2							
EIX	Edison International	2.99%	3							
EE	El Paso Electric Company	5.20%	1							
ETR	Entergy Corporation	-6.67%	1							
ES	Eversource Energy	5.65%	4							
EXC	Exelon Corporation	3.19%	3							
FE	FirstEnergy	-4.74%	2							
GXP	Great Plains Energy	-	1	6.00)%	23-Oct-17	,	11-Dec-17	23-Jan-18	B Different accounting basis of the revised LTG estimates
HE	Hawaiian Electric	8.50%	1							
IDA	IDACORP, Inc.	3.10%	1							
MGEE	MGE Energy	-	1	4.00	0%	2-Mar-11		9-Aug-11	5-Feb-12	2 Contributor update pending: Estimate failed freshness policy
NEE	NextEra Energy	8.85%	4							
NWE	NorthWestern Corporation	3.12%	2							
OGE	OGE Energy Corporation	5.80%	1							
OTTR	Otter Tail Corporation	9.00%	1							
PCG	PG&E Corporation	3.63%	3							
PNW	Pinnacle West Capital Corporation	3.63%	2							
PNM	PNM Resources	5.80%	1							
POR	Portland General Electric Company	3.50%	1							
PPL	PPL Corporation	2.14%	2							
PEG	PS Enterprise	3.39%	2							
SCG	SCANA	4.00%	1							
SRE	Sempra Energy	9.85%	2							
SO	Southern Company	2.17%	3							
VVC	Vectren	6.50%	2							
WEC	WEC Energy Group	4.34%	3							
WR	Westar Energy	2.80%	1							
XEL	Xcel Energy Inc.	6.15%	3							

AFTER 180 DAYS WITHOUT REVISION OR REAPPROVAL, ESTIMATES ARE REMOVED.

Last Known LTG Estimate: last available estimate of the company Estimate Date: the date the estimate reflected in "Last Known LTG Estimate" was calculated Confirmed Date: the date the estimate was last received by IBES Exclusion Date: the date the estimate was removed or expired



	September	October	November	December .	Januarv	February	6 Month	IBES	GDP	Weighted	Adjusted	DCF	
				Div. Yield D		Div. Yield		Growth	Growth		Div. Yield	Estimate	
Alliant Energy	2.97%	2.96%	2.85%	2.88%	3.29%	3.50%	3.08%	5.45%	4.28%	5.06%	3.15%	8.21%	
Ameren	2.97%	2.94%	2.79%	2.98%	3.21%	3.37%	3.04%	6.40%	4.28%	5.69%	3.13%	8.82%	
American Electric	3.27%	3.27%	3.27%	3.28%	3.53%	3.75%	3.40%	5.63%	4.28%	5.18%	3.48%	8.66%	
Avangrid	3.63%	3.49%	3.37%	3.34%	3.51%	3.62%	3.49%	10.70%	4.28%	8.56%	3.64%	12.20%	
Black Hills	2.56%	2.66%	3.09%	3.23%	3.37%	3.57%	3.08%	3.50%	4.28%	3.76%	3.14%	6.90%	
Centerpoint	3.47%	3.52%	3.54%	3.56%	3.71%	3.80%	3.60%	7.62%	4.28%	6.51%	3.72%	10.22%	
CMS Energy	2.80%	2.81%	2.70%	2.74%	2.92%	3.35%	2.89%	7.04%	4.28%	6.12%	2.97%	9.10%	
Con Edison	3.32%	3.31%	3.16%	3.17%	3.39%	3.69%	3.34%	3.11%	4.28%	3.50%	3.40%	6.90%	
DTE Energy	3.00%	3.01%	2.92%	3.15%	3.31%	3.46%	3.14%	5.58%	4.28%	5.15%	3.22%	8.37%	
Duke Energy	4.14%	4.14%	3.97%	4.11%	4.42%	4.67%	4.24%	3.43%	4.28%	3.71%	4.32%	8.03%	
Edison Intern.	2.74%	2.76%	2.68%	3.35%	3.87%	3.87%	3.21%	2.99%	4.28%	3.42%	3.27%	6.69%	
El Paso Electric	2.42%	2.35%	2.30%	2.32%	2.52%	2.67%	2.43%	5.20%	4.28%	4.89%	2.49%	7.38%	
Exelon	3.49%	3.36%	3.19%	3.24%	3.38%	3.72%	3.40%	3.19%	4.28%	3.55%	3.46%	7.01%	
IDA	2.45%	2.43%	2.48%	2.49%	2.72%	2.84%	2.57%	3.10%	4.28%	3.49%	2.61%	6.11%	
NextEra Energy	2.65%	2.60%	2.55%	2.52%	2.55%	2.91%	2.63%	8.85%	4.28%	7.33%	2.73%	10.06%	
Northwestern	3.57%	3.62%	3.42%	3.42%	3.72%	4.02%	3.63%	3.12%	4.28%	3.51%	3.69%	7.20%	
OGE Energy	3.36%	3.68%	3.71%	3.88%	4.18%	4.25%	3.84%	5.80%	4.28%	5.29%	3.95%	9.24%	
Otter Tail	2.97%	2.83%	2.75%	2.78%	3.14%	3.25%	2.95%	9.00%	4.28%	7.43%	3.06%	10.49%	
Pinnacle West	3.00%	3.21%	3.11%	3.15%	3.39%	3.60%	3.24%	3.63%	4.28%	3.85%	3.30%	7.15%	
Portland General	2.90%	2.93%	2.80%	2.87%	3.12%	3.32%	2.99%	2.70%	4.28%	3.23%	3.04%	6.27%	
PPL	4.08%	4.18%	4.32%	4.67%	5.02%	5.22%	4.58%	2.14%	4.28%	2.85%	4.64%	7.50%	
PS Enterprise	3.74%	3.59%	3.36%	3.31%	3.44%	3.50%	3.49%	3.39%	4.28%	3.69%	3.56%	7.24%	
Southern Co.	4.70%	4.58%	4.45%	4.64%	5.09%	5.29%	4.79%	2.17%	4.28%	2.87%	4.86%	7.74%	
WEC Energy Group	3.21%	3.18%	3.04%	3.08%	3.22%	3.58%	3.22%	4.34%	4.28%	4.32%	3.29%	7.61%	
Xcel Energy	2.96%	2.98%	2.85%	2.90%	3.09%	3.30%	3.01%	6.15%	4.28%	5.53%	3.10%	8.62%	
										Median		7.74%	
										25th Percentile			
										75th Percentile			
										Midpoint		9.16%	
										Max		12.20%	
										Min		6.11%	

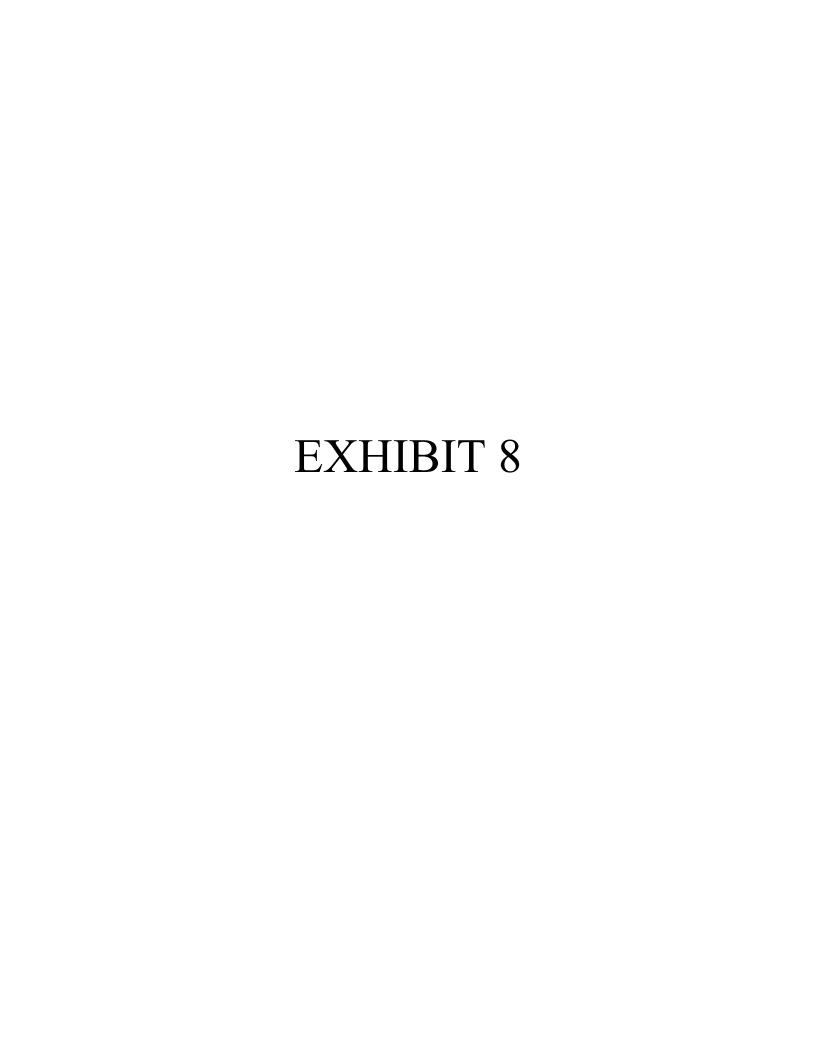


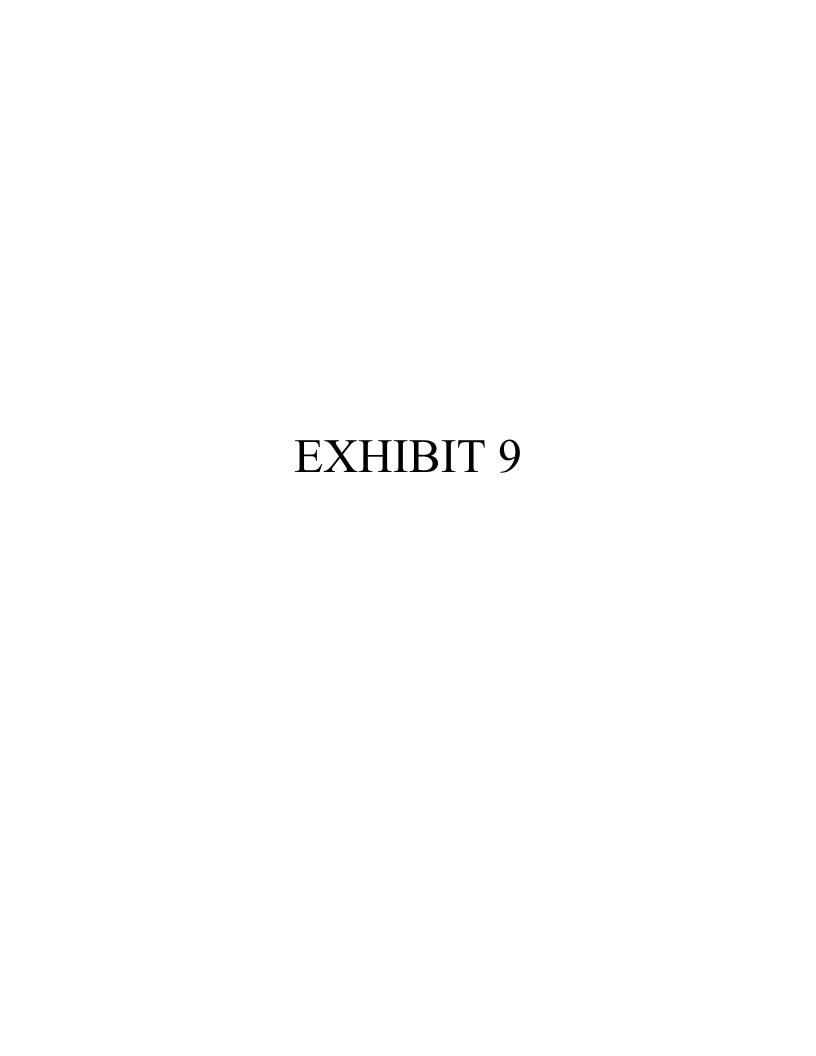
	Exhibit 8: Analysis	of Historical Interest R	ates
	Moody's Yields	Moody's Yields	U.S. Treasury
Month-Year	Corporate Aaa (%)	Corporate Baa (%)	10-Year Yields (%)
January-11	5.04	6.09	3.39
February-11	5.22	6.15	3.58
March-11	5.13	6.03	3.41
April-11	5.16	6.02	3.46
May-11	4.96	5.78	3.17
June-11	4.99	5.75	3.00
July-11	4.93	5.76	3.00
August-11	4.37	5.36	2.30
September-11	4.09	5.27	1.98
October-11	3.98	5.37	2.15
November-11	3.87	5.14	2.01
December-11	3.93	5.25	1.98
January-12	3.85	5.23	1.97
February-12	3.85	5.14	1.97
March-12	3.99	5.23	2.17
April-12	3.96	5.19	2.05
May-12	3.80	5.07	1.80
June-12	3.64	5.02	1.62
July-12	3.40	4.87	1.53
August-12	3.48	4.91	1.68
September-12	3.49	4.84	1.72
October-12	3.47	4.58	1.75
November-12	3.50	4.51	1.65
December-12	3.65	4.63	1.72
January-13	3.80	4.73	1.91
February-13	3.90	4.85	1.98
March-13	3.93	4.85	1.96
April-13	3.73	4.59	1.76
May-13	3.89	4.73	1.93
June-13	4.27	5.19	2.30
July-13	4.34	5.32	2.58
August-13	4.54	5.42	2.74
September-13	4.64	5.47	2.81
October-13	4.53	5.31	2.62
November-13	4.63	5.38	2.72
December-13	4.62	5.38	2.90
January-14	4.49	5.19	2.86

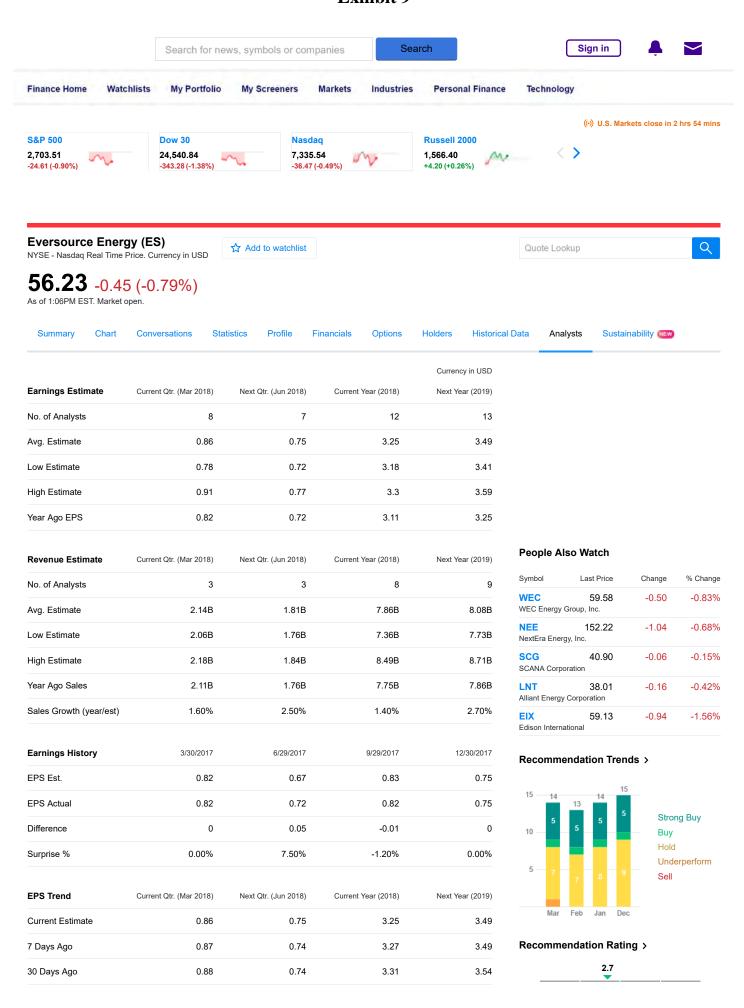
February-14	4.45	5.10	2.71
March-14	4.38	5.06	2.72
April-14	4.24	4.90	2.71
May-14	4.16	4.76	2.56
June-14	4.25	4.80	2.60
July-14	4.16	4.73	2.54
August-14	4.08	4.69	2.42
September-14	4.11	4.80	2.53
October-14	3.92	4.69	2.30
November-14	3.92	4.79	2.33
December-14	3.79	4.74	2.21
January-15	3.46	4.45	1.88
February-15	3.61	4.51	1.98
March-15	3.64	4.54	2.04
April-15	3.52	4.48	1.94
May-15	3.98	4.89	2.20
June-15	4.19	5.13	2.36
July-15	4.15	5.20	2.32
August-15	4.04	5.19	2.17
September-15	4.07	5.34	2.17
October-15	3.95	5.34	2.07
November-15	4.06	5.46	2.26
December-15	3.97	5.46	2.24
January-16	4.00	5.45	2.09
February-16	3.96	5.34	1.78
March-16	3.82	5.13	1.89
April-16	3.62	4.79	1.81
May-16	3.65	4.68	1.81
June-16	3.50	4.53	1.64
July-16	3.28	4.22	1.50
August-16	3.32	4.24	1.56
September-16	3.41	4.31	1.63
October-16	3.51	4.38	1.76
November-16	3.86	4.71	2.14
December-16	4.06	4.83	2.49
January-17	3.92	4.66	2.43
February-17	3.95	4.64	2.42
March-17	4.01	4.68	2.48
April-17	3.87	4.57	2.30
May-17	3.85	4.55	2.30
June-17	3.68	4.37	2.19
July-17	3.70	4.39	2.32

August-17	3.63	4.31	2.21
September-17	3.63	4.30	2.20
October-17	3.60	4.32	2.36
November-17	3.57	4.27	2.35
December-17	3.51	4.22	2.40
January-18	3.55	4.26	2.58
February-18	3.82	4.51	2.86

Source: https://fred.stlouisfed.org/help-faq

Economic Research Division Federal Reserve Bank of St. Louis





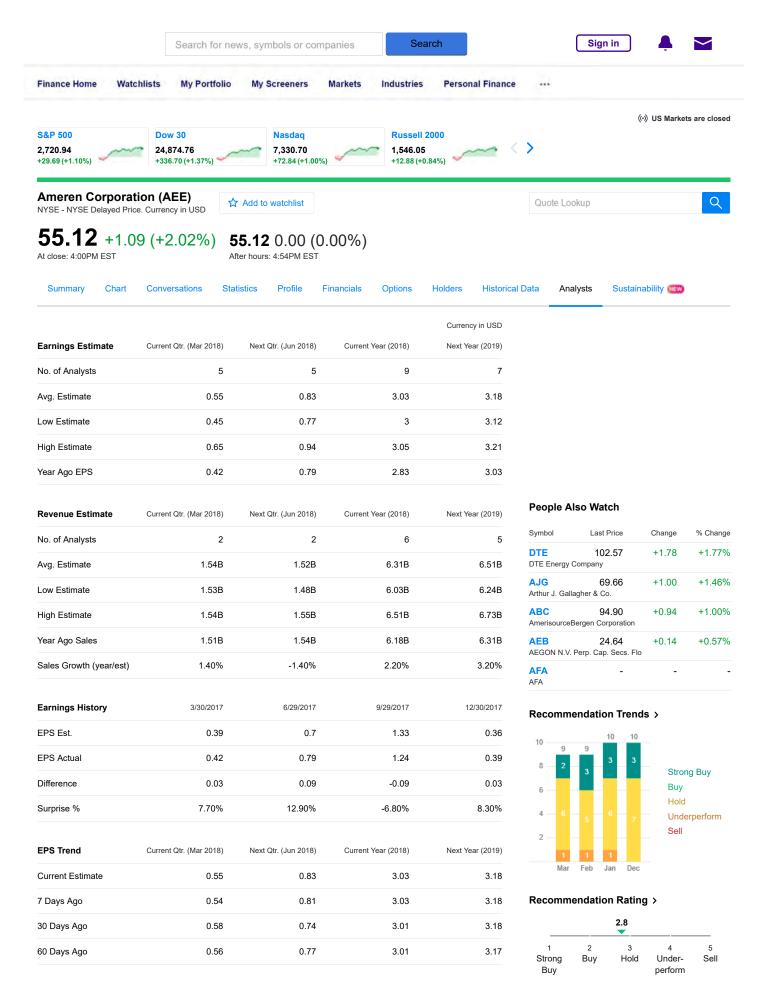
ES 56.23 -0.45 -0.79% : Eversource Energy (D/B/A) - Yahoo Finance **Exhibit 9**

EPS Tre	Curre			2	r (2010) Sear	Mart Year (2019)	5	2 3 4 Suy Hold Under- Sign in room	5 Sell
60 Days Ago		0.89	0.74		3.32	3.55	Buy	penorm	
Finance Agome	Watchlists	My Poltfülio	My Screene0s74	Markets	Industries	Personal विसर्वाce	Analyst Pric Technology	ce Targets (13) >	
								Average 61.46	
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current '	Year (2018)	Next Year (2019)	Low 54.00		High 66.00
Up Last 7 Days		N/A	N/A		N/A	3	Curre	ent 56.23	Ü
Up Last 30 Days		N/A	1		1	3	Upgrades &	Downgrades >	
Down Last 30 Days		2	1		1	6	↓ Downgrade	Morgan Stanley: Overweight to Equal- Weight	2/13/2018
Down Last 90 Days		N/A	N/A		N/A	N/A	↓ Downgrade	Janney Capital: Buy to Neutral	2/2/2018
Growth Estimates		ES	Industry		Sector	S&P 500	Initiated	UBS: to Neutral	2/2/2018
Current Qtr.		4.90%	N/A		N/A	0.35	↓ Downgrade	Credit Suisse: Neutral to	1/23/2018
Next Qtr.		4.20%	N/A		N/A	0.38		Underperform	
Current Year		4.50%	N/A		N/A	0.19	↑ Upgrade	Morgan Stanley: Equal- Weight to Overweight	12/13/2017
Next Year		7.40%	N/A		N/A	0.11	Initiated	Credit Suisse: to Neutra	1/25/2017
Next 5 Years (per annum)		5.65%	N/A		N/A	0.12			
aimum)							Mor	e Upgrades & Downgrade	S
Past 5 Years (per annum)		5.52%	N/A		N/A	N/A			

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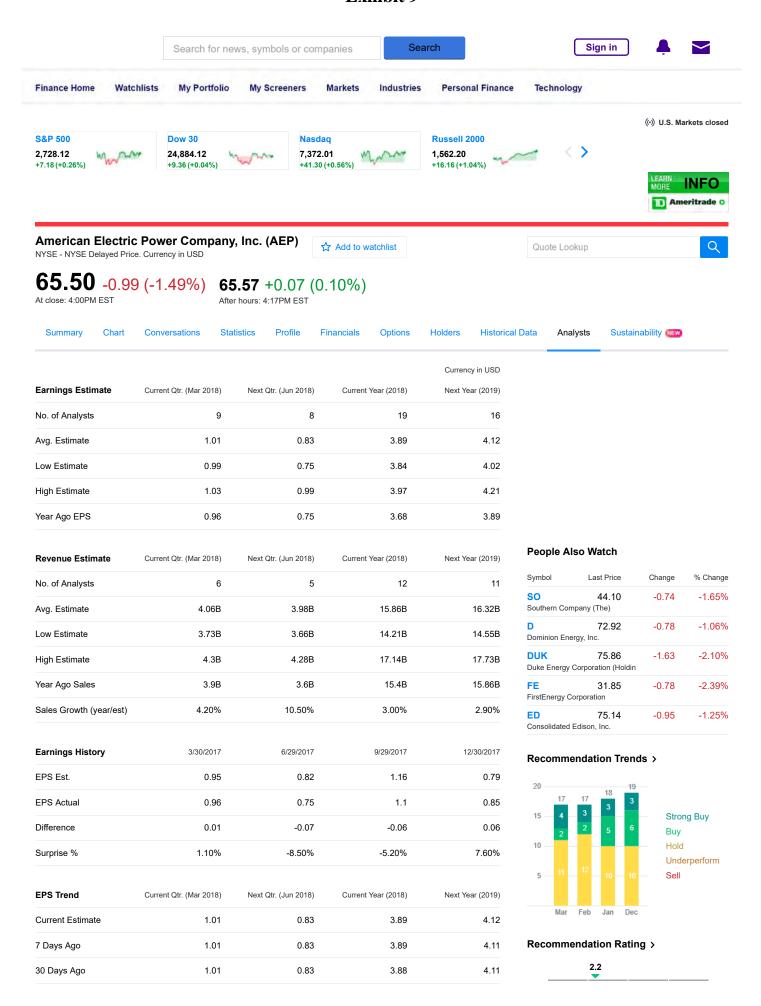
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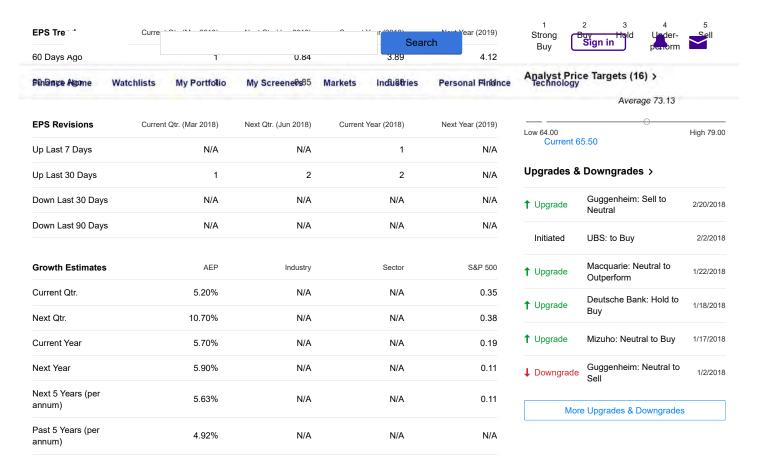
EPS Tre · · · · C	urre ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	N 101 /1 2010	Sear	New Year (2019)	Analyst Pric	e Targets (7) >	
90 Days Ago	0.48	0.71	3.02	3.21		Average 58.14	
Finance Home Watchlis EPS Revisions	My Portfolio	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low-64.00 Current	○ 55.12	High 63.00
Jp Last 7 Days	1	1	1	1	Upgrades &	Downgrades >	
Up Last 30 Days	2	2	4	3	Initiated	UBS: to Neutral	2/2/2018
Down Last 30 Days	N/A	N/A	N/A	N/A	↓ Downgrade	Morgan Stanley: Equal- Weight to Underweight	12/13/2017
Down Last 90 Days	N/A	N/A	N/A	N/A	↓ Downgrade	Goldman Sachs: to Sell	6/26/2017
Growth Estimates	AEE	Industry	Sector	S&P 500	↓ Downgrade	Goldman Sacris. to Sell	0/20/2017
Current Qtr.	31.00%	N/A	N/A	0.35	↓ Downgrade	Barclays: to Equal-Weigh	nt 5/25/2017
Next Qtr.	5.10%	N/A	N/A	0.38	↑ Upgrade	Barclays: to Overweight	4/4/2016
Current Year	7.10%	N/A	N/A	0.19	↓ Downgrade	Argus Research: to Hold	4/4/2016
Next Year	5.00%	N/A	N/A	0.11			
Next 5 Years (per annum)	6.40%	N/A	N/A	0.11	More	e Upgrades & Downgrades	5
Past 5 Years (per annum)	13.47%	N/A	N/A	N/A			

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AEP 65.50 -0.99 -1.49% : American Electric Power Company - Yahoo F... **Exhibit 9**



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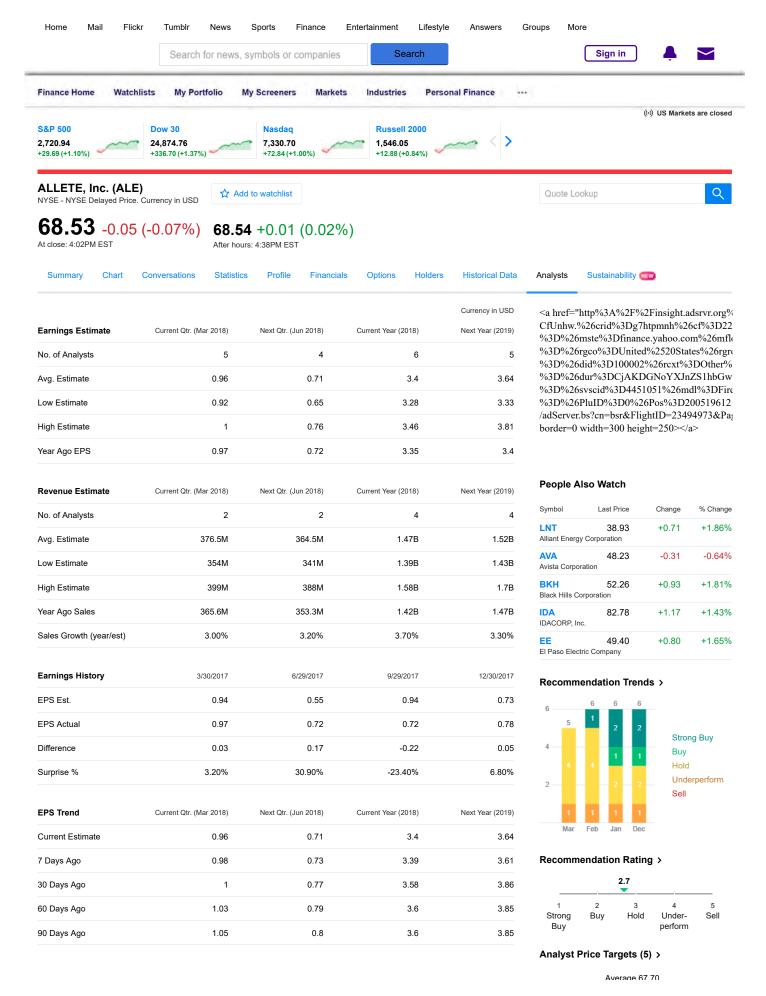


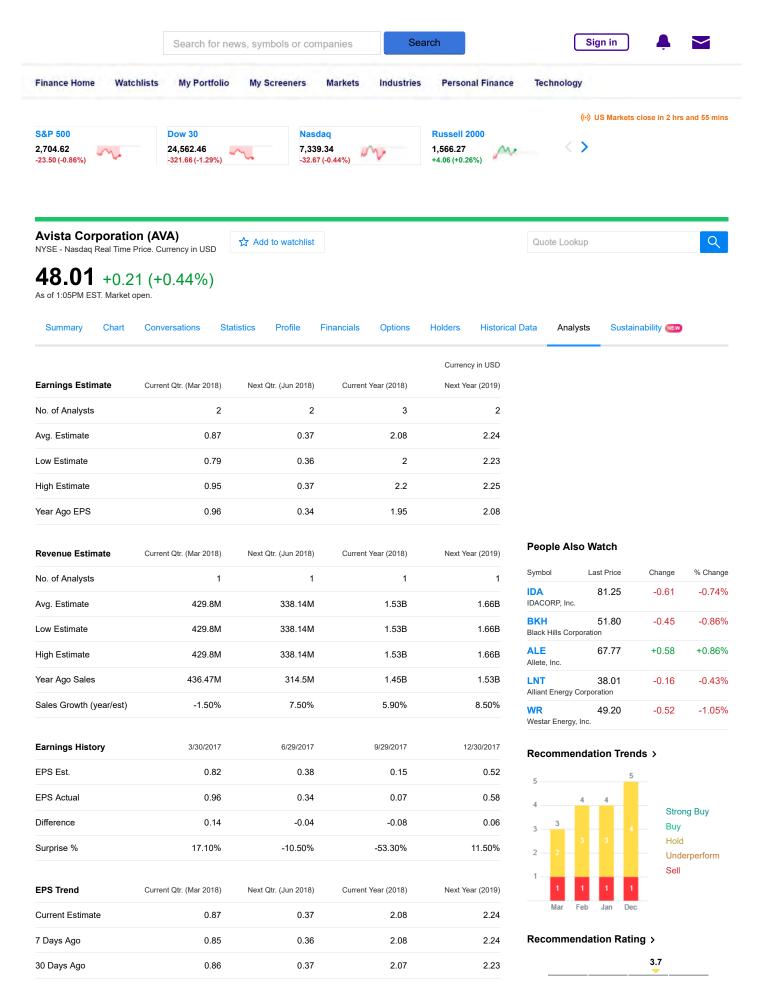
Exhibit 9 Page 7

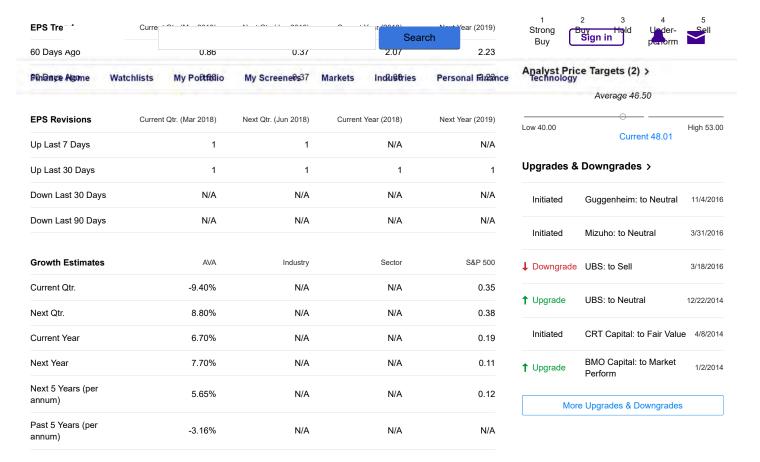
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Up Last			Searc	N/A	Low 60.00	Current 68.53 Sign in	76.00
Up Last 30 Days Finance Home Watchlists Down Last 30 Days	N/A My Portfolio	My Screeners N/A Markets	N/A Industries N/A	Personal Finance N/A N/A	Upgrades &	Downgrades >	
Down Last 90 Days	N/A	N/A	N/A	N/A	Initiated	Mizuho: to Buy	2/28/2018
0			•	000 500	↓ Downgrade	KeyBanc: Overweight to Sector Weight	10/19/2017
Growth Estimates Current Qtr.	-1.00%	Industry N/A	Sector N/A	S&P 500 0.35	↓ Downgrade	Williams Capital: Buy to Hold	10/12/2017
Next Qtr.	-1.40%	N/A	N/A	0.38	Initiated	Macquarie: to Neutral	11/4/2016
Current Year	1.50%	N/A	N/A	0.19	↓ Downgrade	William Blair: to Hold	3/29/2016
Next Year	7.10%	N/A	N/A	0.11			
Next 5 Years (per annum)	5.00%	N/A	N/A	0.11	↑ Upgrade	Wunderlich: to Buy	12/8/2015
Past 5 Years (per annum)	3.82%	N/A	N/A	N/A	More	e Upgrades & Downgrades	6

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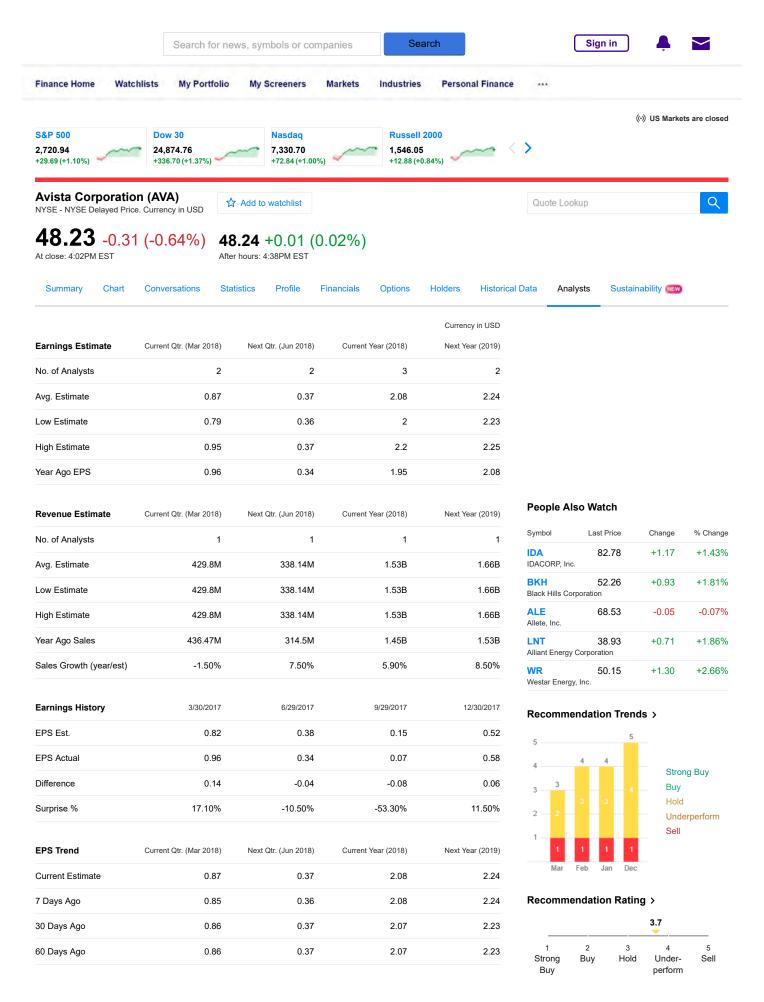




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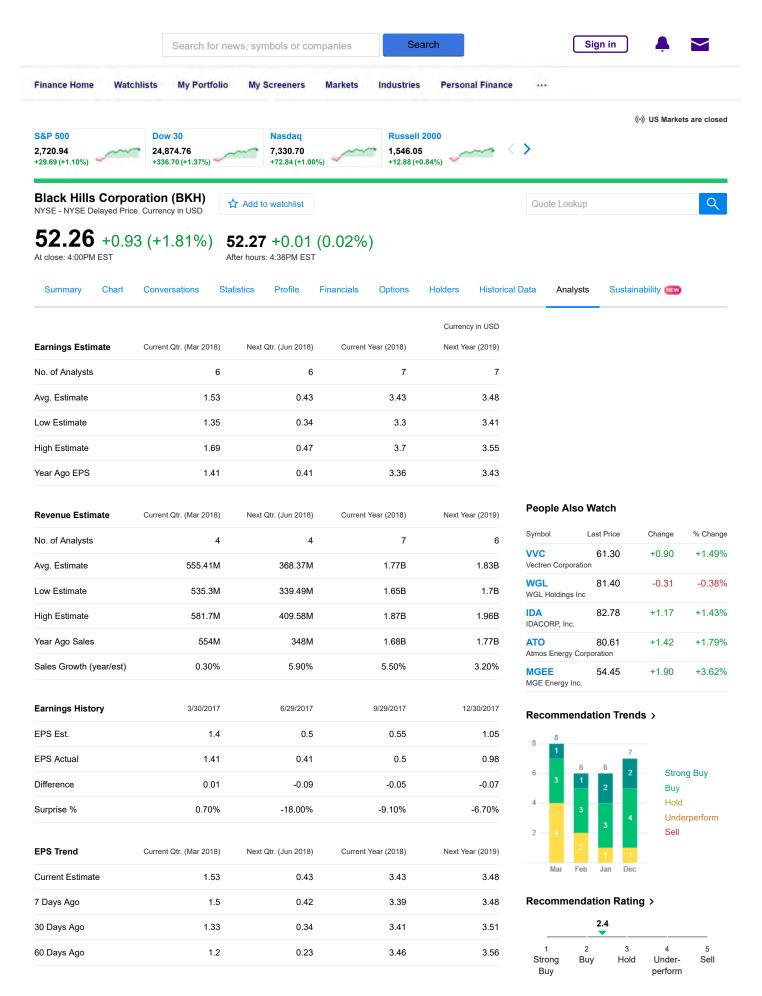
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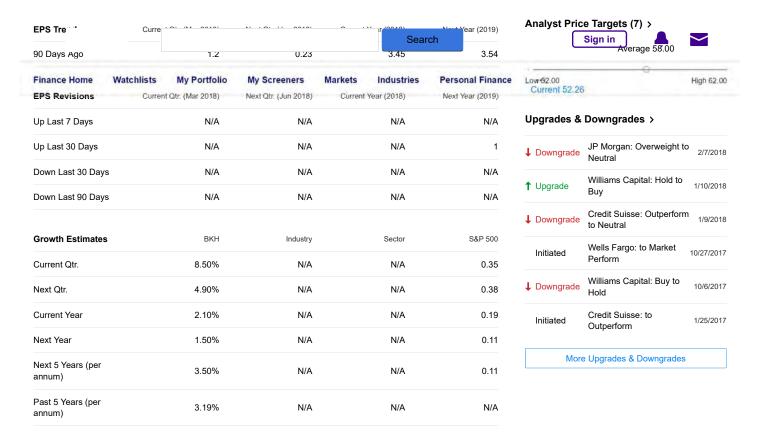


EPS Tre	Curre			7 (0010) S	earch (2019)	Analyst Pric	ce Targets (2) >	~
90 Days Ago		0.86	0.37	2.08	2.23		Average 46.50	
Finance Home EPS Revisions	Watchlists	My Portfolio at Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industrie Current Year (2018)	Personal Finance Next Year (2019)	Low:40.00	Current 48.23	High 53.00
Up Last 7 Days		1	1	N/A	N/A	Upgrades &	Downgrades >	
Up Last 30 Days		1	1	1	1	Initiated	Guggenheim: to Neutral	11/4/2016
Down Last 30 Days		N/A	N/A	N/A	N/A	location and	Mendo A Norted	0/04/0040
Down Last 90 Days		N/A	N/A	N/A	N/A	Initiated	Mizuho: to Neutral	3/31/2016
						↓ Downgrade	UBS: to Sell	3/18/2016
Growth Estimates		AVA	Industry	Sector	S&P 500	↑ Upgrade	UBS: to Neutral	12/22/2014
Current Qtr.		-9.40%	N/A	N/A	0.35	Opgrade	OBO. to Nedital	12/22/2014
Next Qtr.		8.80%	N/A	N/A	0.38	Initiated	CRT Capital: to Fair Value	e 4/8/2014
Current Year		6.70%	N/A	N/A	0.19	↑ Upgrade	BMO Capital: to Market	1/2/2014
Next Year		7.70%	N/A	N/A	0.11		1 01101111	
Next 5 Years (per annum)		5.65%	N/A	N/A	0.11	Mor	e Upgrades & Downgrades	
Past 5 Years (per annum)		-3.16%	N/A	N/A	N/A			

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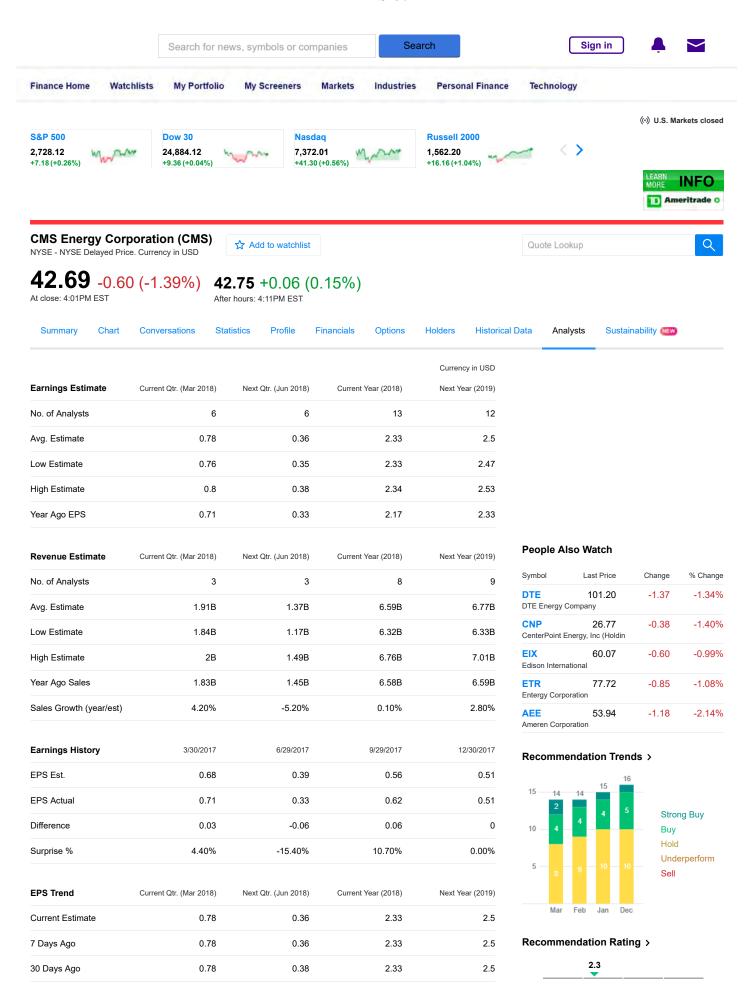




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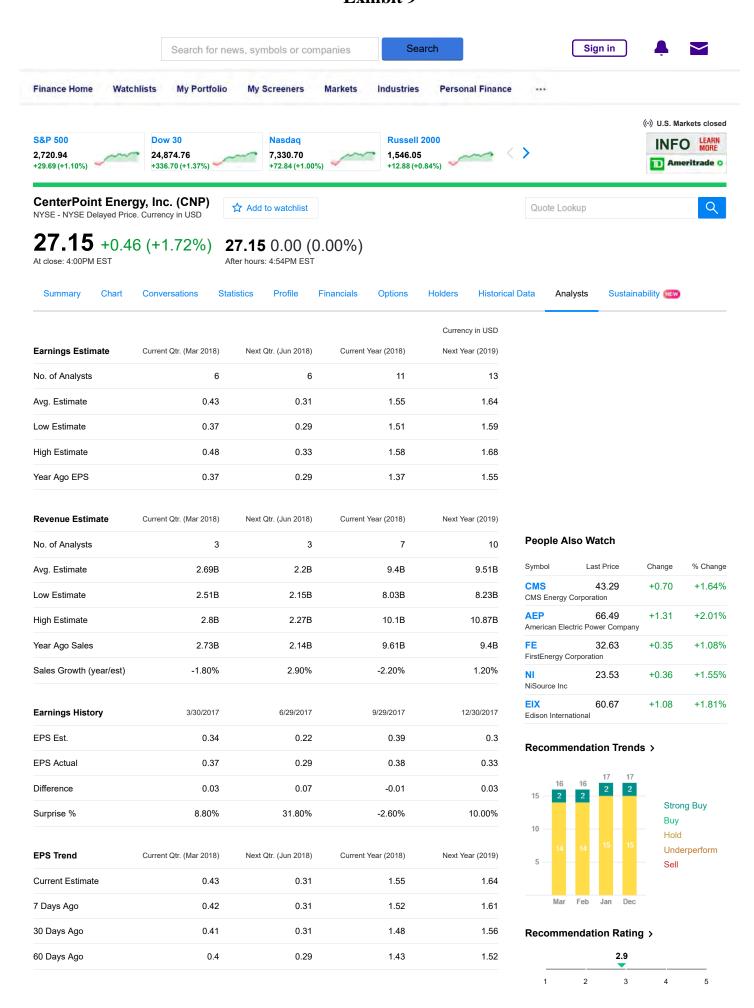
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EPS Tre	Curre		11 101 (1 0010)		Sear	ch (2019)	Strong Buy	Buy Hold Under- Sign in perform	Sell
60 Days Ago		0.78	0.37		2.33	2.5			
Findage Allome	Watchlists	My Poltfalio	My Screene®s37	Markets	Incluistries	Personal Filiance	Analyst P Technolog	rice Targets (14) >	
								Average 48.21	
EPS Revisions	Current	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)		Low 45.00	High 51.50
Up Last 7 Days		N/A	N/A		N/A	1	Current 42.6	69	
Up Last 30 Days		N/A	N/A		5	3	Upgrades	& Downgrades >	
Down Last 30 Days		N/A	N/A		1	N/A	↑ Upgrade	Hilliard Lyons: Neutral to Long-Term Buy	2/15/2018
Down Last 90 Days		N/A	N/A		N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Growth Estimates		CMS	Industry		Sector	S&P 500	↑ Upgrade	Wells Fargo: Market Perform to Outperform	12/18/2017
Current Qtr.		9.90%	N/A		N/A	0.35	Initiated	Bank of America: to Buy	10/24/2017
Next Qtr.		9.10%	N/A		N/A	0.38		,	
Current Year		7.40%	N/A		N/A	0.19	Initiated	Guggenheim: to Neutral	9/5/2017
Next Year		7.30%	N/A		N/A	0.11	Initiated	Morgan Stanley: to Equal- Weight	7/31/2017
Next 5 Years (per annum)		7.04%	N/A		N/A	0.11	M	lore Upgrades & Downgrades	
Past 5 Years (per annum)		7.36%	N/A		N/A	N/A		<u> </u>	

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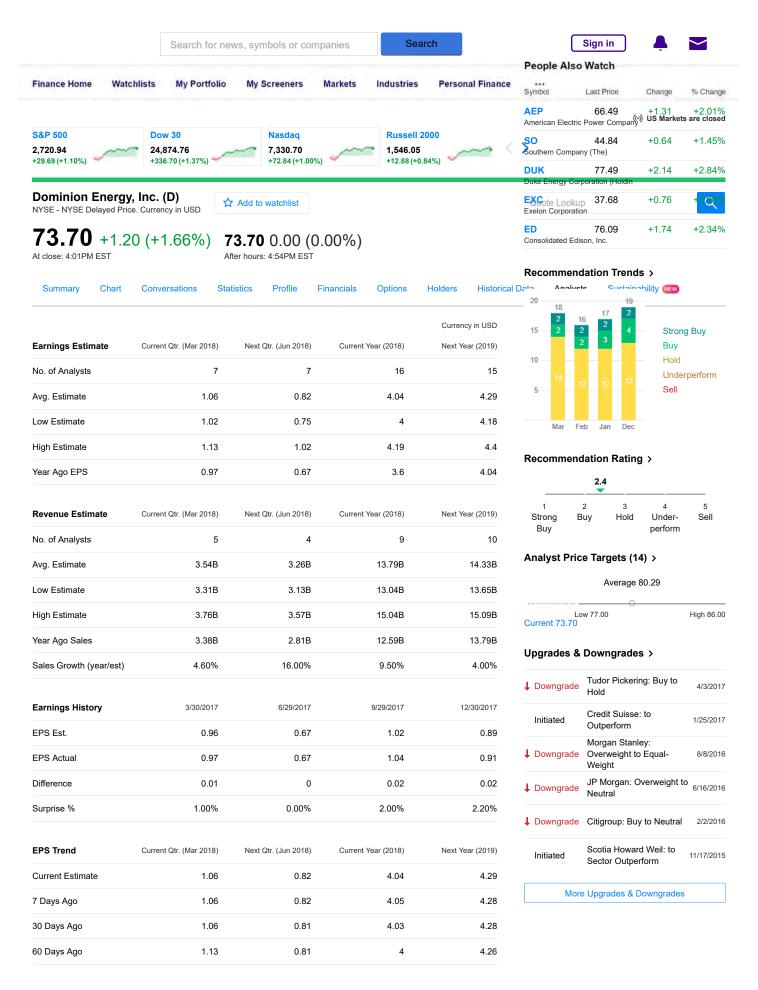
CNP 27.15 0.46 1.72% : CenterPoint Energy, Inc (Holdin - Yahoo Finance **Exhibit 9**

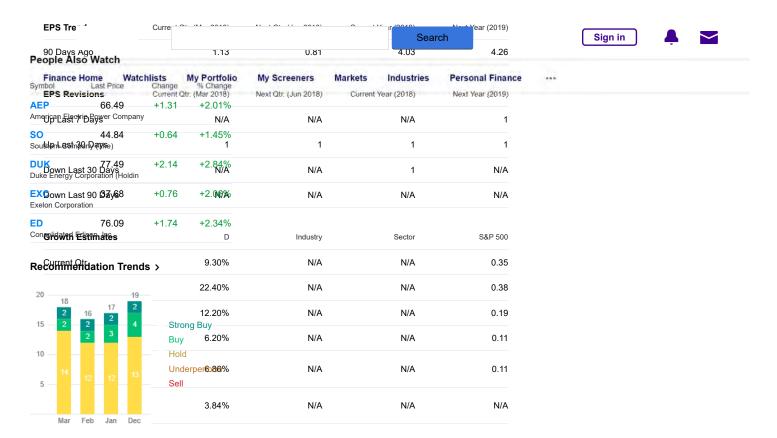
EPS Tre	Curre		11 101 /1 0040	2	Sear	ch (2019)		Sign in	\smile
90 Days Ago		0.4	0.29		1.44	1.52	Analyst Pric	e Targets (14) >	
Finance Home Wa	tchlists Current C	My Portfolio atr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets I	ndustries r (2018)	Personal Finance Next Year (2019)	(ini	Average 28.57	
Up Last 7 Days		2	2		9	8	Low 27.00 Current 27.1	5	High 30.00
Up Last 30 Days		4	4		11	11	Upgrades &	Downgrades >	
Down Last 30 Days		3	2		N/A	N/A	↓ Downgrade	Guggenheim: Buy to Neutral	12/4/2017
Down Last 90 Days		N/A	N/A		N/A	N/A	↑ Upgrade	Credit Suisse: Underperform to Neutral	8/14/2017
Growth Estimates		CNP	Industry		Sector	S&P 500	Initiated	UBS: to Neutral	12/20/2016
Current Qtr.		16.20%	N/A		N/A	0.35	↓ Downgrade	Credit Suisse: to	11/8/2016
Next Qtr.		6.90%	N/A		N/A	0.38	→ Downgrade	Underperform	11/0/2010
Current Year		13.10%	N/A		N/A	0.19	Initiated	Guggenheim: to Buy	11/4/2016
Next Year		5.80%	N/A		N/A	0.11	Initiated	Evercore ISI Group: to Hold	9/12/2016
Next 5 Years (per annum)		7.62%	N/A		N/A	0.11	More	Upgrades & Downgrades	
Past 5 Years (per annum)		2.77%	N/A		N/A	N/A	Work	opgrades & Downgrades	

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Recommendation Rating >

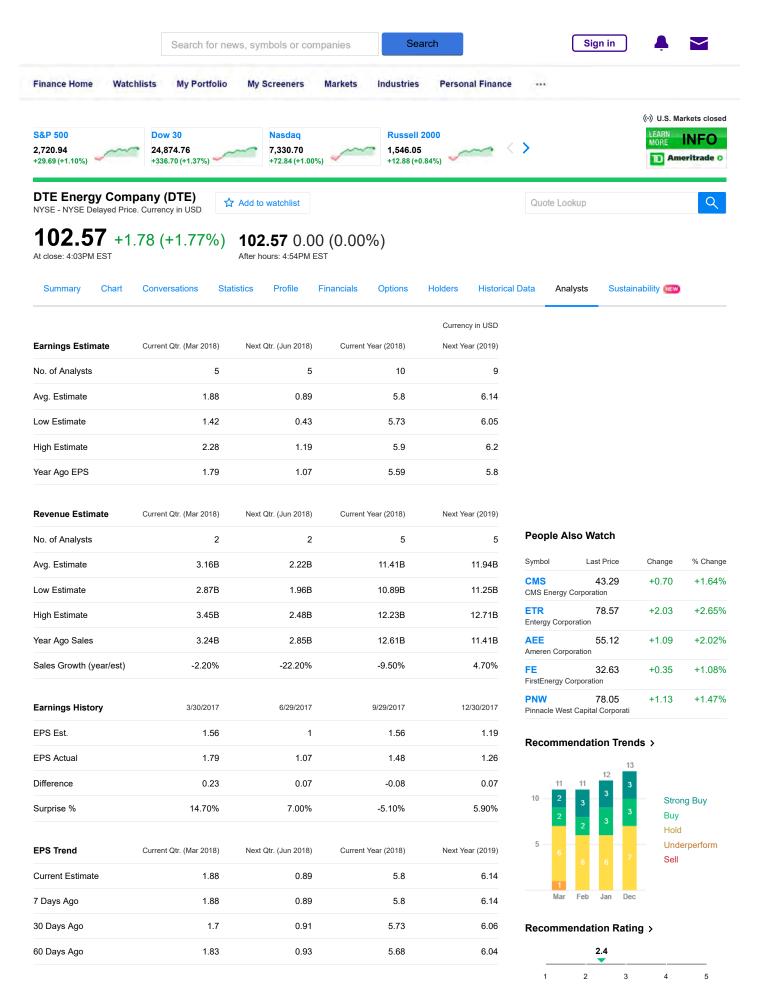


Analyst Price Targets (14) >

Average 80.2	.9
Low 77.00 Current 73.70	High 86.00

Upgrades & Downgrades >

	J	
↓ Downgrade	Tudor Pickering: Buy to Hold	4/3/2017
Initiated	Credit Suisse: to Outperform	1/25/2017
↓ Downgrade	Morgan Stanley: Overweight to Equal- Weight	8/8/2016
↓ Downgrade	JP Morgan: Overweight to Neutral	6/16/2016
↓ Downgrade	Citigroup: Buy to Neutral	2/2/2016
Initiated	Scotia Howard Weil: to Sector Outperform	11/17/2015
More	Upgrades & Downgrades	

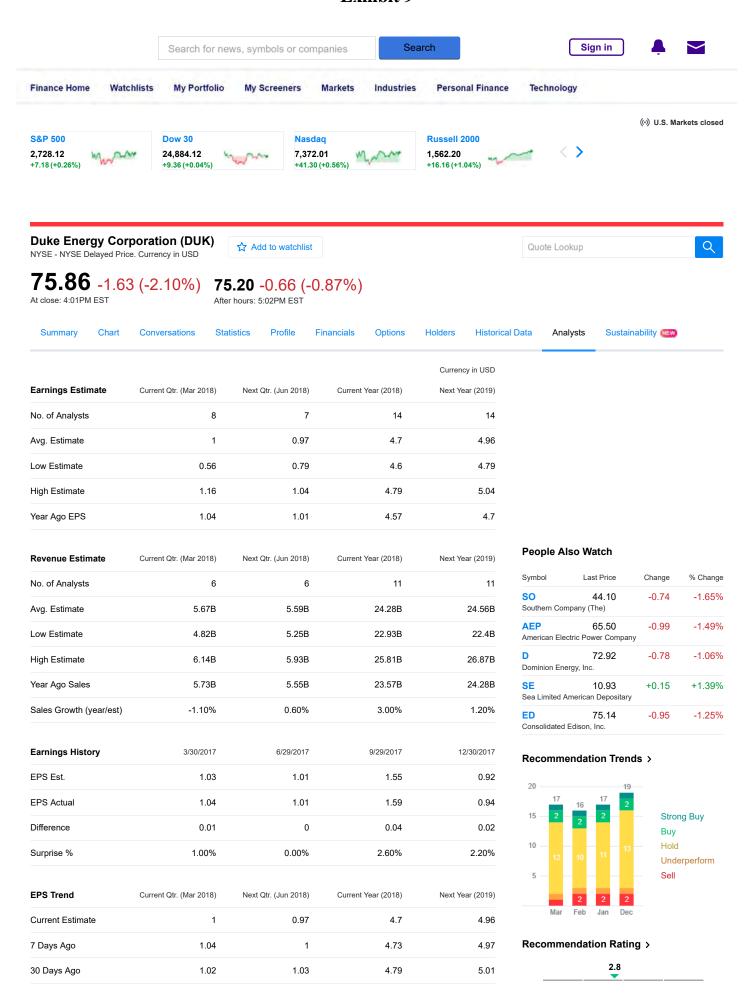


EPS Tre	Curre		11 101 /1 0040		Sear	ch (2019)	۲	Sign in	\smile
90 Days Ago		1.8	0.9		5.68	6.04	Analyst Pric	e Targets (10) >	
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance	***	Average 111.00	
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)		404.00	11: 1 440.50
Up Last 7 Days		N/A	N/A		N/A	N/A	Current 102.57	ow 104.00	High 118.50
Up Last 30 Days		2	1		5	7	Upgrades &	Downgrades >	
Down Last 30 Days	3	N/A	N/A		N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Down Last 90 Days	3	N/A	N/A		N/A	N/A	↑ Upgrade	Wells Fargo: Market Perform to Outperform	1/12/2018
Growth Estimates		DTE	Industry		Sector	S&P 500	Initiated	Credit Suisse: to Neutral	1/25/2017
Current Qtr.		5.00%	N/A		N/A	0.35			
Next Qtr.		-16.80%	N/A		N/A	0.38	↓ Downgrade	UBS: to Neutral	1/9/2017
Current Year		3.80%	N/A		N/A	0.19	↑ Upgrade	Bank of America: to Buy	11/22/2016
Next Year		5.90%	N/A		N/A	0.11	Initiated	Jefferies: to Buy	11/14/2016
Next 5 Years (per annum)		5.58%	N/A		N/A	0.11			
Past 5 Years (per annum)		7.40%	N/A		N/A	N/A	Mon	e Upgrades & Downgrades	5

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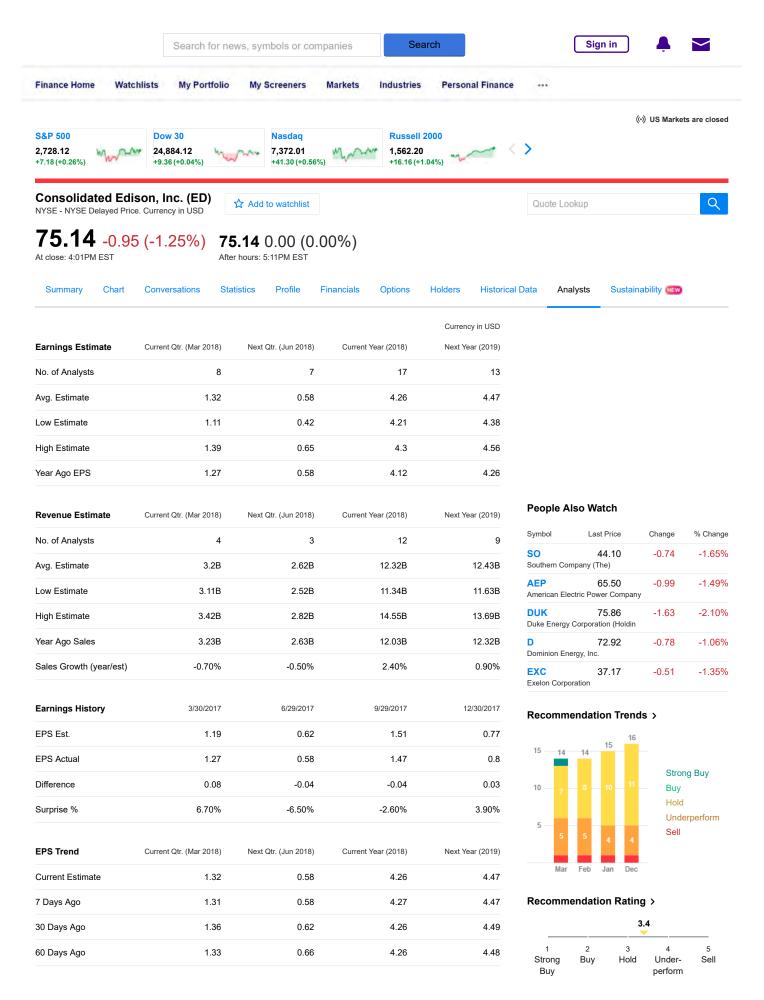
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EPS Tre					Sear		Strong Buy	Sign in Under-							
60 Days Ago		1.1	1.08		4.83	5.08									
Findaça Agome	Watchlists	My Pořtřálio	My Screeners08	Markets	Industries	Personal Rinkince		e Targets (15) >							
							А	verage 81.87							
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current Year (2018)		Current Year (2018)		Next Year (2019)		ow 77.00	High 91.00				
Up Last 7 Days		1	N/A		N/A	N/A	Current 75.86								
Up Last 30 Days		1	N/A		N/A	1	Upgrades &	Downgrades >							
Down Last 30 Days		1	2		N/A	2	Initiated	UBS: to Buy	2/2/2018						
Down Last 90 Days		N/A	N/A		N/A	N/A	↑ Upgrade	Credit Suisse: Neutral to Outperform	1/23/2018						
Growth Estimates		DUK	Industry		Sector	S&P 500	↓ Downgrade	Goldman Sachs: Buy to Neutral	1/11/2018						
Current Qtr.		-3.80%	N/A		N/A	0.35	↑ Upgrade	Goldman Sachs: to Buy	6/26/2017						
Next Qtr.		-4.00%	N/A		N/A	0.38	13								
Current Year		2.80%	80% N/A		N/A	0.19	Initiated	Credit Suisse: to Neutral	1/25/2017						
Next Year		5.50%	N/A		N/A	0.11	↓ Downgrade	Citigroup: to Sell	1/11/2017						
Next 5 Years (per annum)		4.19%	N/A	N/A		N/A		N/A		N/A N/A		0.11	More Upgrades & Downgrades		;
Past 5 Years (per annum)		3.01%	N/A		N/A	N/A									

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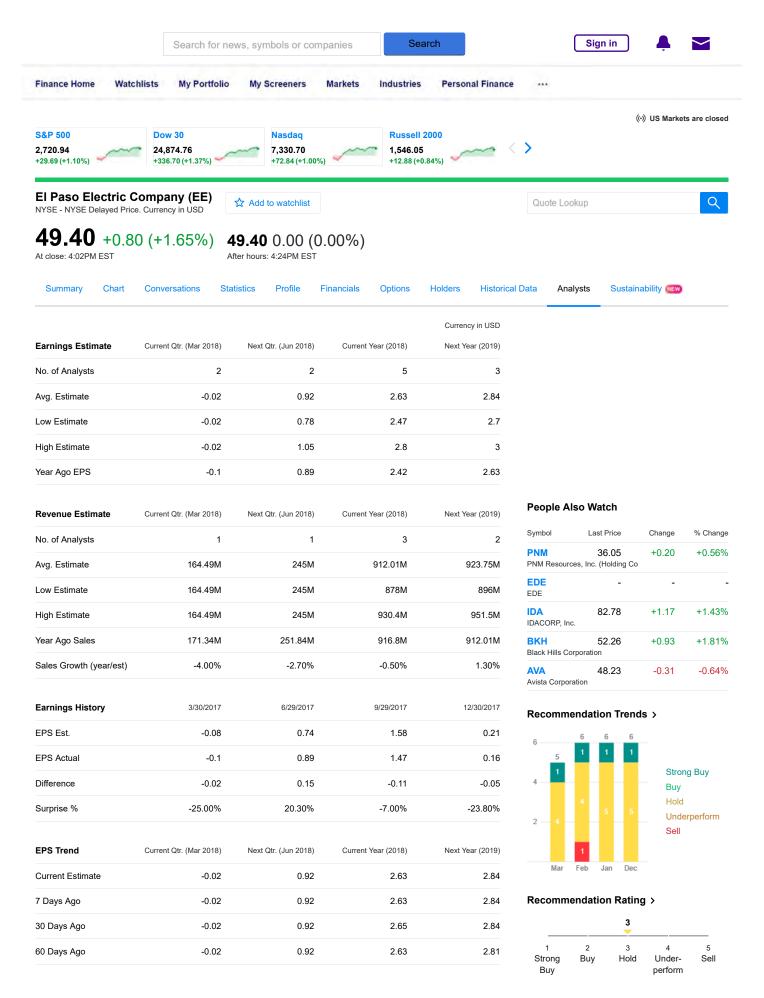
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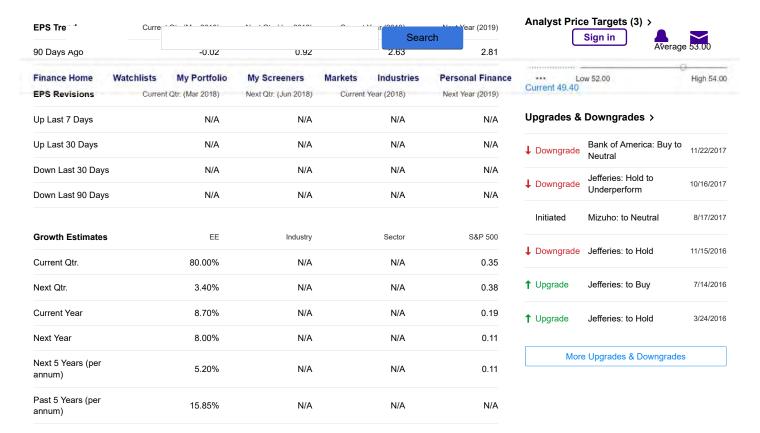


EPS Tre	Curre	. 0. //. 00/0	N (0) (1 0040)	Sea	rch Year (2019)	Analyst Pric	e Targets (13) >	~
90 Days Ago		1.29	0.63	4.26	4.49		Average 76.96	
Finance Home EPS Revisions	Watchlists Curren	My Portfolio t Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low#2.00 Curre	ent 75.14	High 82.00
Up Last 7 Days		N/A	N/A	1	1	Upgrades &	Downgrades >	
Up Last 30 Days		N/A	1	4	2	Initiated	UBS: to Neutral	2/2/2018
Down Last 30 Days Down Last 90 Days		N/A N/A	N/A N/A	N/A	N/A N/A	Initiated	JP Morgan: to Underweight	1/12/2018
			IVA	N/A		↓ Downgrade	Evercore ISI Group: In- Line to Underperform	9/26/2017
Growth Estimates		ED	Industry	Sector	S&P 500	↓ Downgrade	Jefferies: to Hold	6/13/2017
Current Qtr.		3.90%	N/A	N/A	0.35			
Next Qtr.		N/A	N/A	N/A	0.38	Initiated	Credit Suisse: to Underperform	1/25/2017
Current Year		3.40%	N/A	N/A	0.19	↑ Upgrade	Deutsche Bank: to Hold	10/24/2016
Next Year		4.90%	N/A	N/A	0.11			
Next 5 Years (per annum)		3.11%	N/A	N/A	0.11	Mon	e Upgrades & Downgrades	6
Past 5 Years (per annum)		2.08%	N/A	N/A	N/A			

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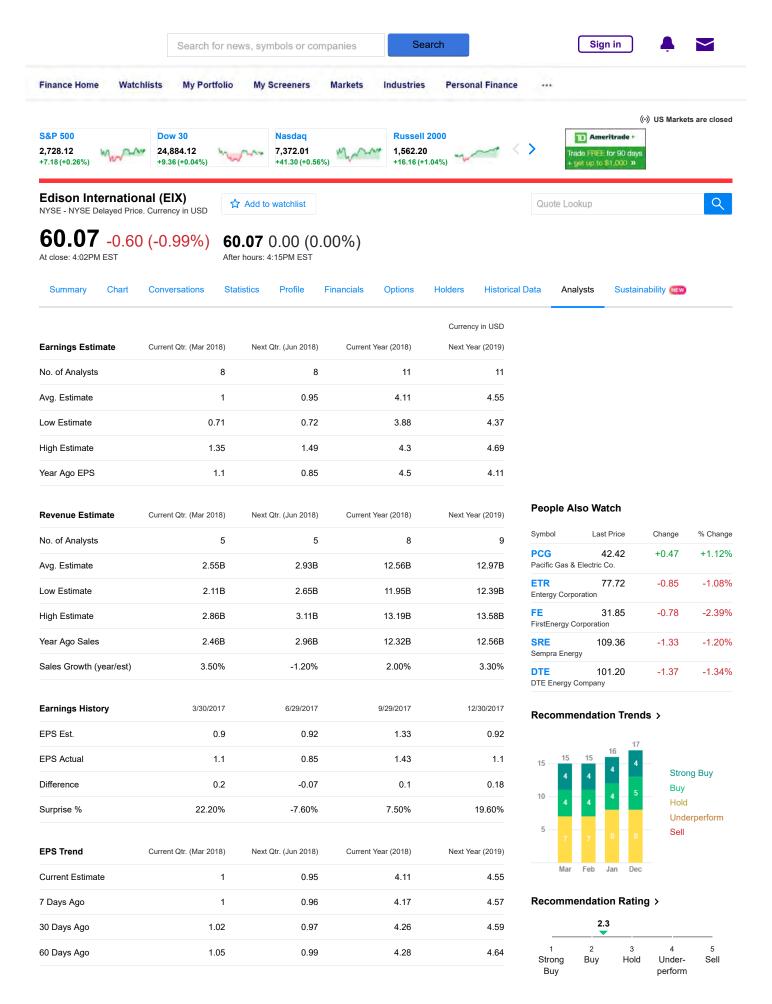




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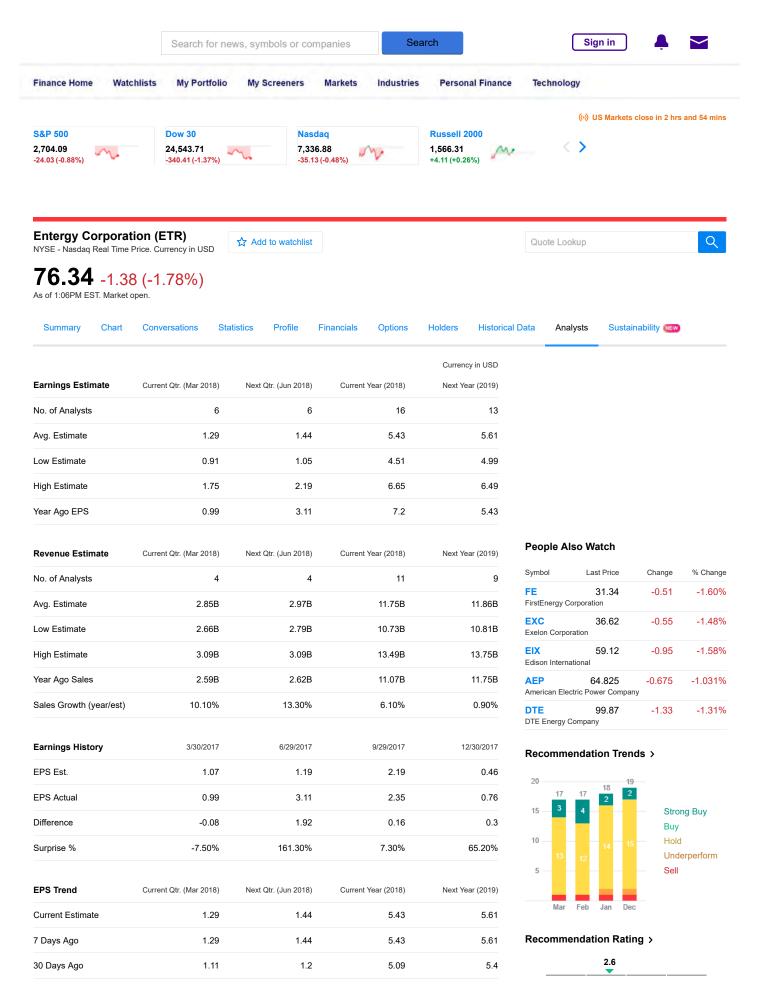


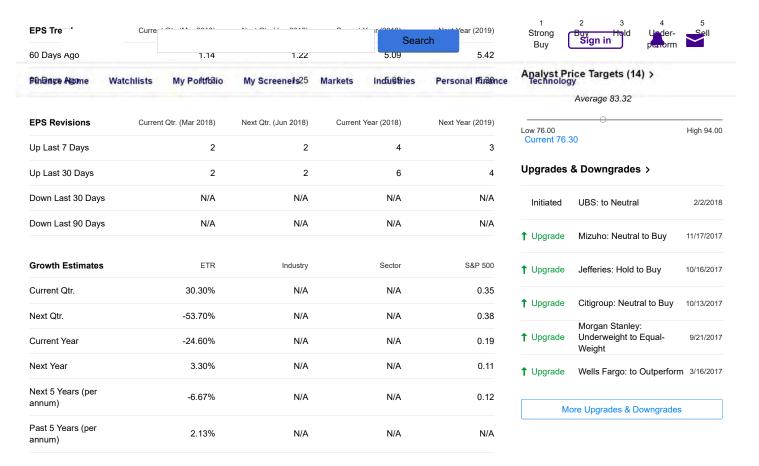
EPS Tre	Curre (A) (A)	N . O. (1 0040)	Sear	rch (2019)	· · · ~	e Targets (15) >	\checkmark
90 Days Ago	1.08	1	4.28	4.64		Average 68.33	
Finance Home Water EPS Revisions	chlists My Portfolio Current Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low-69.00 Current 60.	07	High 74.00
Up Last 7 Days	2	2	1	3	Upgrades &	Downgrades >	
Up Last 30 Days	2	2	1	3	↑ Upgrade	Guggenheim: Neutral to Buy	2/23/2018
Down Last 30 Days	5	5	9	6	Initiated	UBS: to Neutral	2/2/2018
Down Last 90 Days	N/A	N/A	N/A	N/A			
					Initiated	JP Morgan: to Neutral	1/12/2018
Growth Estimates	EIX	Industry	Sector	S&P 500	↓ Downgrade	Edward Jones: Hold to	12/27/2017
Current Qtr.	-9.10%	N/A	N/A	0.35		Sell	
Next Qtr.	11.80%	N/A	N/A	0.38	↓ Downgrade	Mizuho: Buy to Neutral	12/6/2017
Current Year	-8.70%	N/A	N/A	0.19	↑ Upgrade	Jefferies: Hold to Buy	8/11/2017
Next Year	10.70%	N/A	N/A	0.11			
Next 5 Years (per annum)	2.99%	N/A	N/A	0.11	More	e Upgrades & Downgrades	3
Past 5 Years (per annum)	-0.00%	N/A	N/A	N/A			

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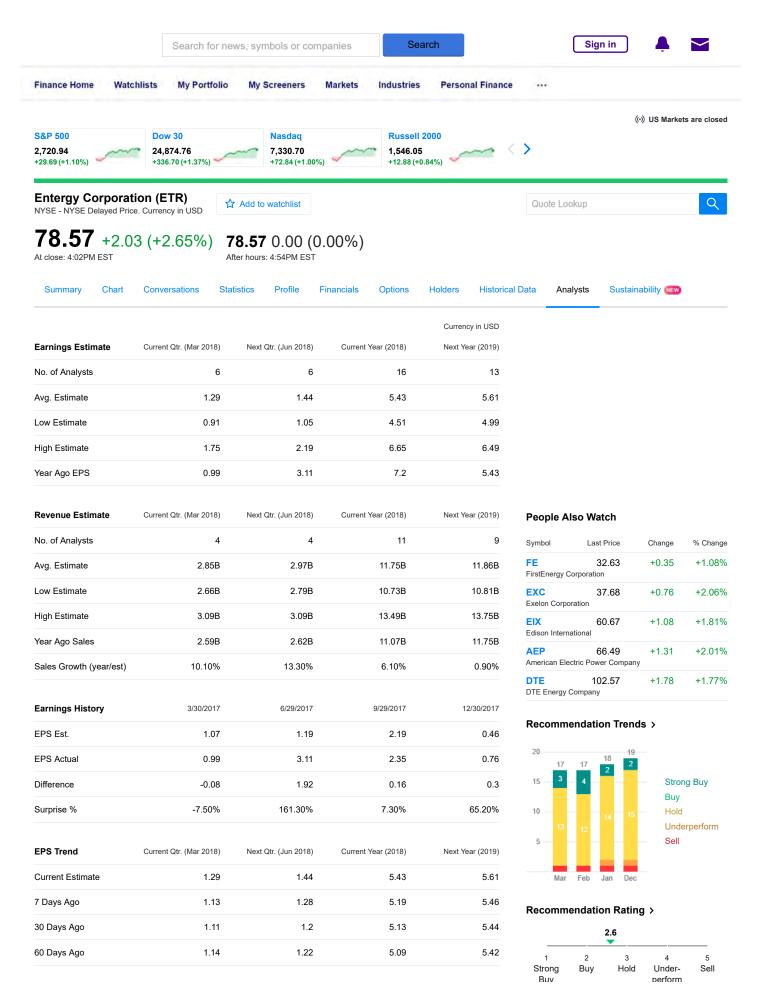




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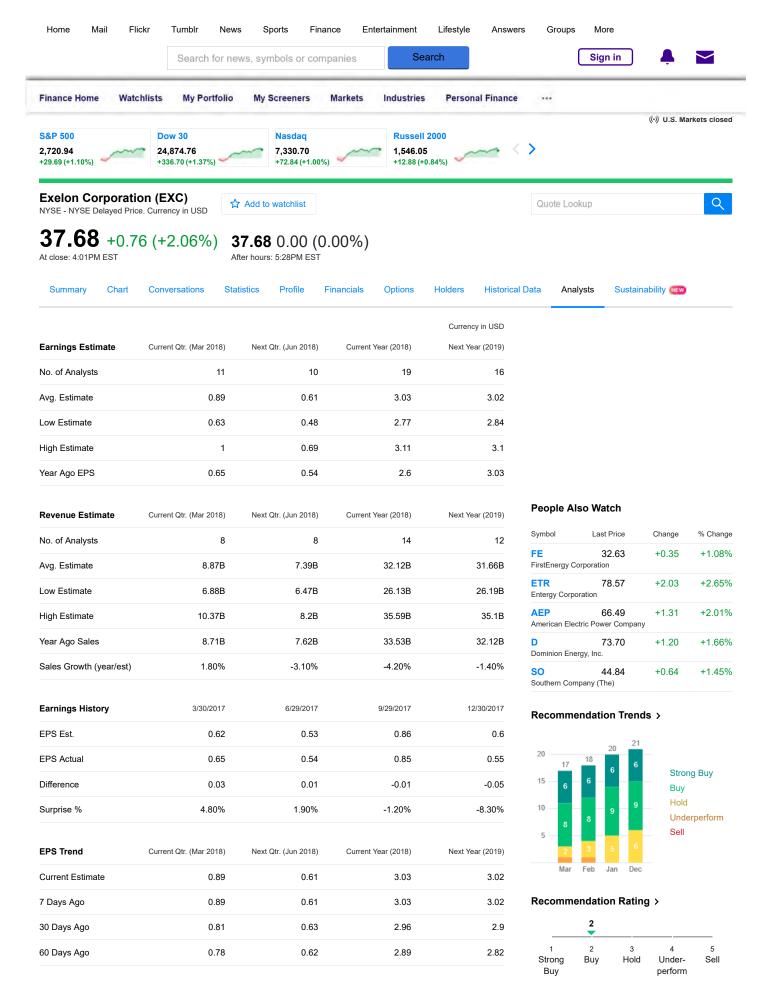
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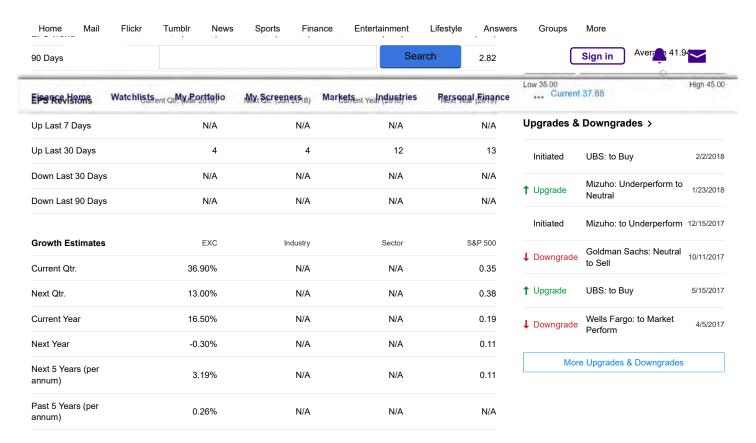


EPS Tre	Curre		11 101 /1 0040	2	Sear	ch (2019)	Analyst P	ice Targets (14)	\checkmark
90 Days Ago		1.13	1.25		5.09	5.38		Average 83.25	
Finance Home EPS Revisions	Watchlists Curren	My Portfolio at Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Current	Industries /ear (2018)	Personal Finance Next Year (2019)	Low 76.00 Curre	ent 78.57	High 94,00
Up Last 7 Days		2	2		4	3	Upgrades	& Downgrades >	
Up Last 30 Days		2	2		6	4			
Down Last 30 Days		N/A	N/A		N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Down Last 90 Days		N/A	N/A		N/A	N/A	† Upgrade	Mizuho: Neutral to Buy	11/17/2017
Growth Estimates		ETR	Industry		Sector	S&P 500	↑ Upgrade	Jefferies: Hold to Buy	10/16/2017
Current Qtr.		30.30%	N/A		N/A	0.35	↑ Upgrade	Citigroup: Neutral to Buy	10/13/2017
Next Qtr.		-53.70%	N/A		N/A	0.38	↑ Upgrade	Morgan Stanley: Underweight to Equal-	9/21/2017
Current Year		-24.60%	N/A		N/A	0.19	.	Weight	
Next Year		3.30%	N/A		N/A	0.11	↑ Upgrade	Wells Fargo: to Outperform	3/16/2017
Next 5 Years (per annum)		-6.67%	N/A		N/A	0.11	M	ore Upgrades & Downgrades	
Past 5 Years (per annum)		2.13%	N/A		N/A	N/A			

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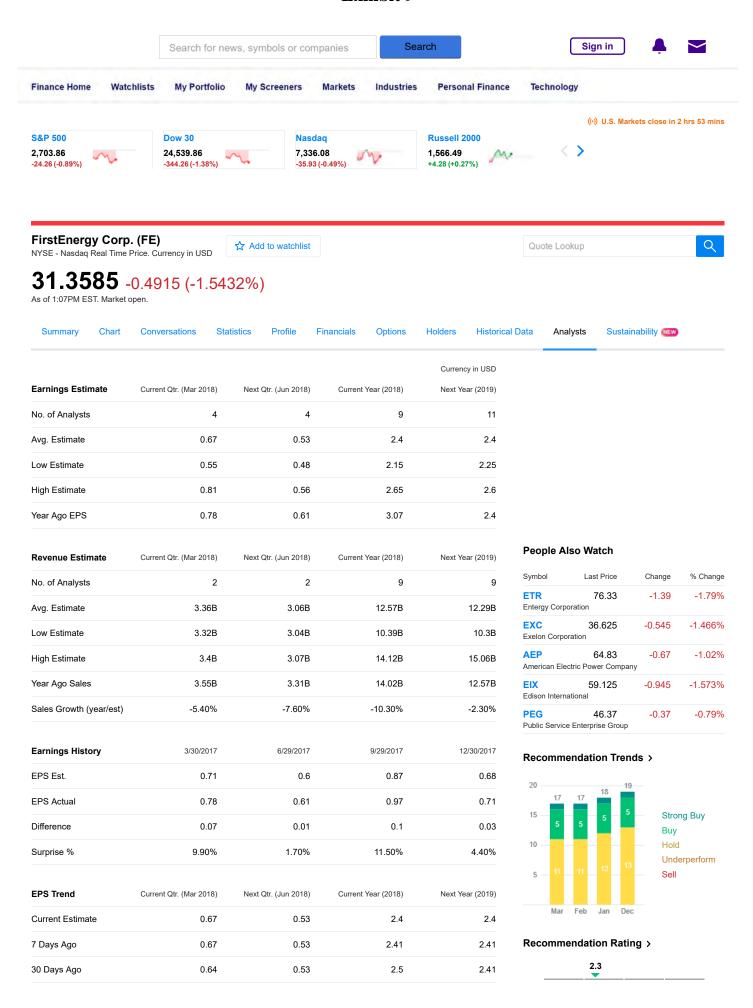




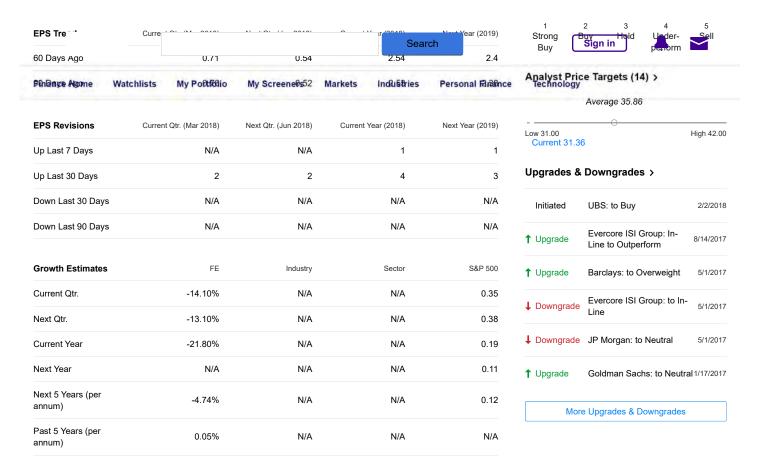
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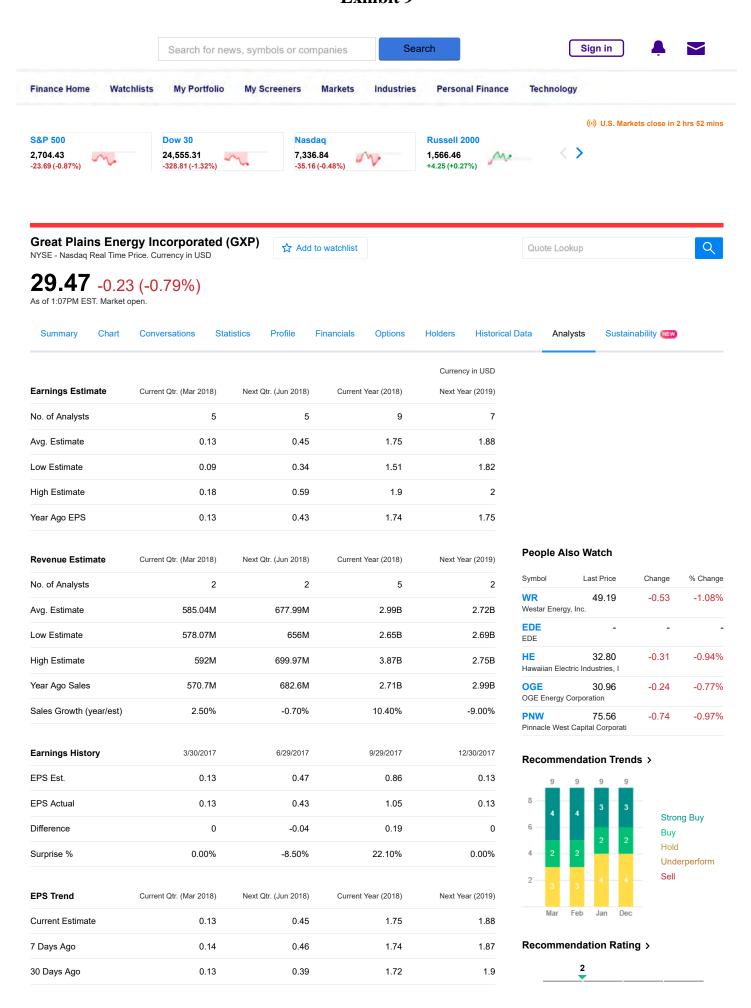
FE 31.3585 -0.4915 -1.5432% : FirstEnergy Corporation - Yahoo Finance **Exhibit 9**



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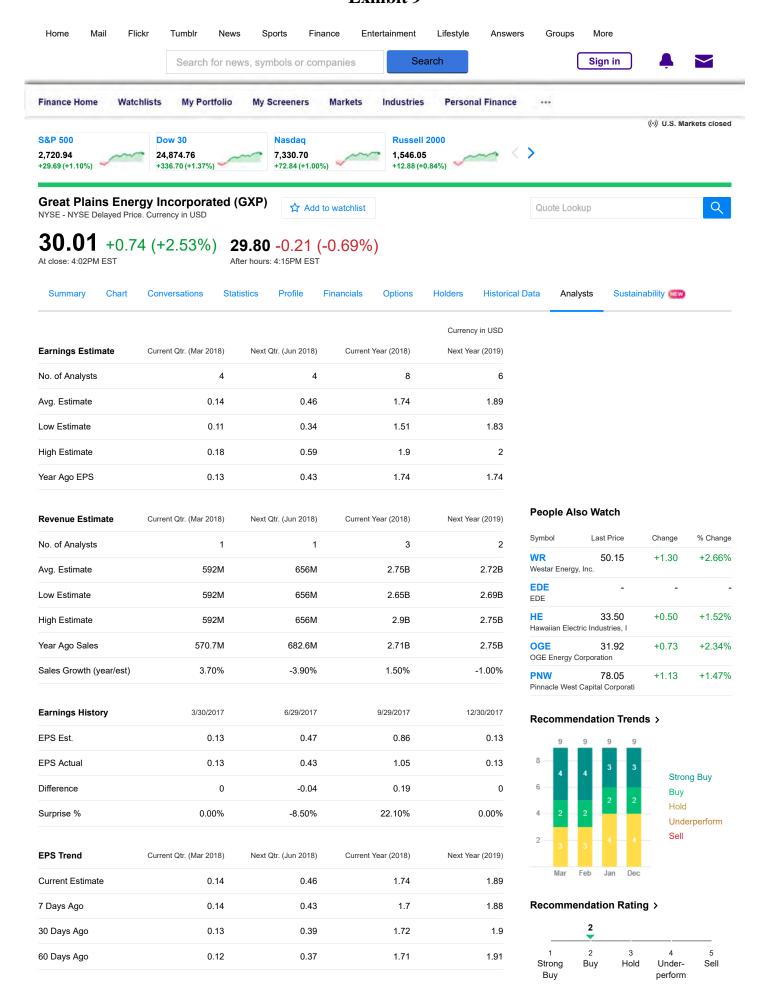


EPS Tre	Curre	. 0. /1. 0040	N 404 (1 0040)		r (0040) Sear	ch (2019)	1 Strong Buy	2 3 4 Buy Hold Under- Sign in penorm	Sell
60 Days Ago		0.12	0.37		1.71	1.91	,		
Findaye Agme	Watchlists	My Poftfolio	My Screene®s37	Markets	Industries	Personal Finance	Analyst P Technolog	rice Targets (7) >	
								Average 31.71	
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)		Low 30.00	High 33.00
Up Last 7 Days		N/A	N/A		N/A	N/A	Current 29.4	17	
Up Last 30 Days		N/A	N/A		1	2	Upgrades	& Downgrades >	
Down Last 30 Days		N/A	N/A		N/A	1	Initiated	UBS: to Neutral	2/2/2018
Down Last 90 Days		N/A	N/A		N/A	N/A	↑ Upgrade	Wells Fargo: Market Perform to Outperform	10/2/2017
Growth Estimates		GXP	Industry		Sector	S&P 500	↑ Upgrade	JP Morgan: to Overweight	7/11/2017
Current Qtr.		N/A	N/A		N/A	0.35	Initiated	UBS; to Neutral	1/5/2017
Next Qtr.		4.70%	N/A		N/A	0.38	ililialed	OBS. to Neutral	1/5/2017
Current Year		0.60%	N/A		N/A	0.19	↑ Upgrade	Ladenburg Thalmann: to Buy	10/26/2016
Next Year		7.40%	N/A		N/A	0.11	↑ Upgrade	Wolfe Research: to Outperform	10/3/2016
Next 5 Years (per annum)		6.00%	N/A		N/A	0.12	N	lore Upgrades & Downgrades	
Past 5 Years (per annum)		15.22%	N/A		N/A	N/A			

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GXP 30.01 0.74 2.53% : Great Plains Energy Incorporate - Yahoo Finance **Exhibit 9**

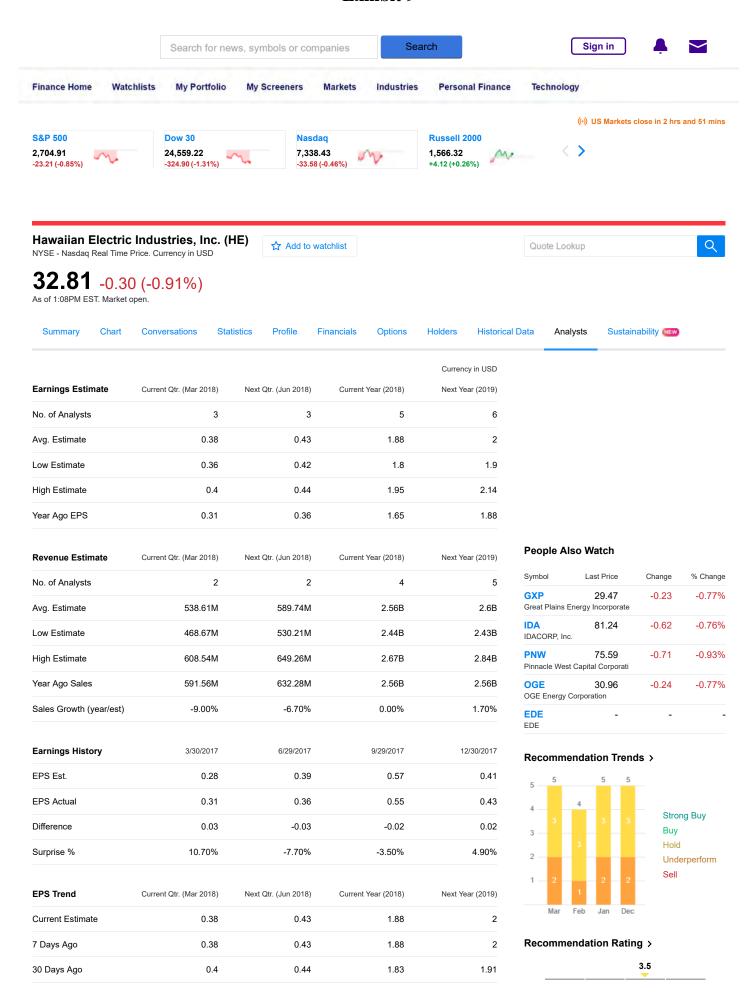


GXP 30.01 0.74 2.53% : Great Plains Energy Incorporate - Yahoo Finance **Exhibit 9**

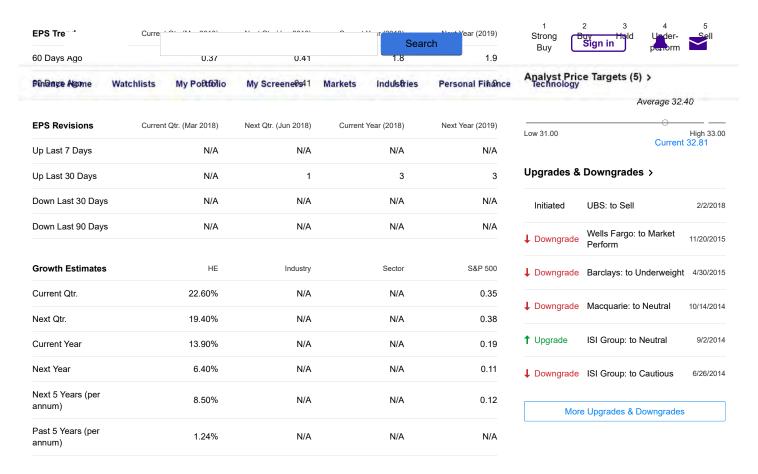
90 Days			Sear	1.92	l	Sign in Average 31	
Ei ps neevilsoms	Watchlistsent Other Portfelio	MX: SGFERREIS 8)	Marketsent Yeal Not West ries	Rers qual (Einance	Low 30.00 Current 30.0	1	High 33.0
Up Last 7 Days	N/A	N/A	1	1	Upgrades	& Downgrades >	
Up Last 30 Days	N/A	N/A	1	2	Initiated	UBS: to Neutral	2/2/201
Down Last 30 Days	N/A	N/A	2	1		Wells Fargo: Market	
Down Last 90 Days	N/A	N/A	N/A	N/A	↑ Upgrade	Perform to Outperform	10/2/201
					↑ Upgrade	JP Morgan: to Overweight	7/11/201
Growth Estimates	GXP	Industry	Sector	S&P 500	Initiated	UBS: to Neutral	1/5/201
Current Qtr.	7.70%	N/A	N/A	0.35	milialed	OBS. to Neutral	1/5/20
Next Qtr.	7.00%	N/A	N/A	0.38	↑ Upgrade	Ladenburg Thalmann: to Buy	10/26/201
Current Year	N/A	N/A	N/A	0.19	↑ Upgrade	Wolfe Research: to Outperform	10/3/201
Next Year	8.60%	N/A	N/A	0.11		Guiperioiiii	
Next 5 Years (per	6.00%	N/A	N/A	0.11	М	ore Upgrades & Downgrades	5
annum)	6.00%	IN/A	IN/A	0.11			

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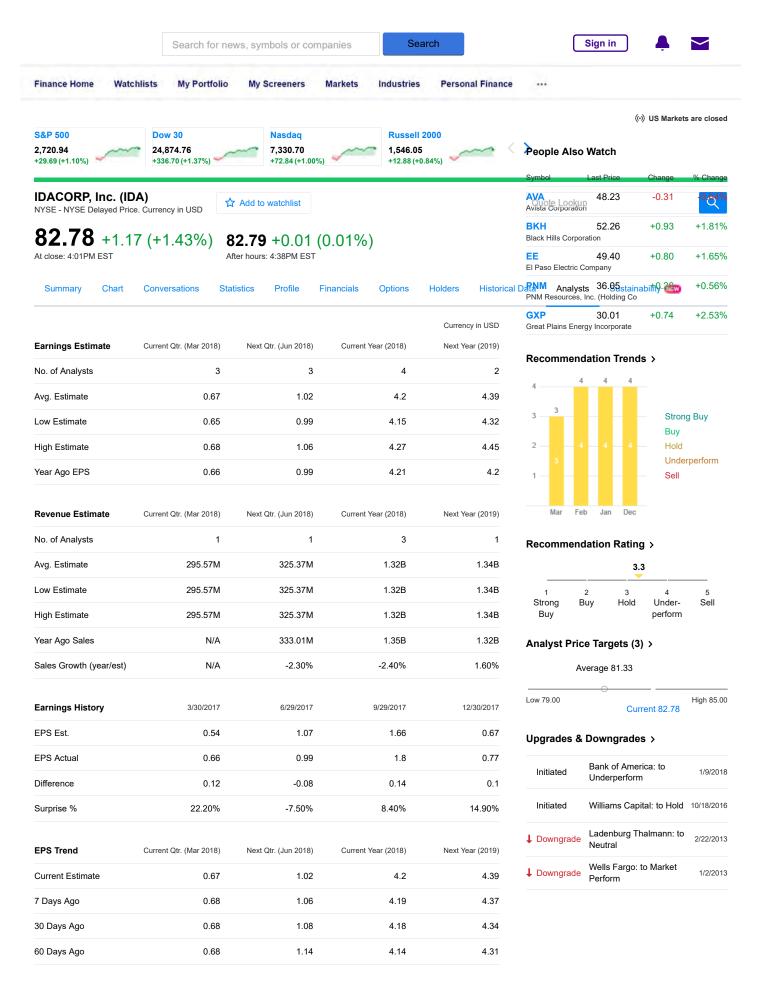
HE 32.81 -0.30 -0.91%: Hawaiian Electric Industries, I - Yahoo Finance **Exhibit 9**

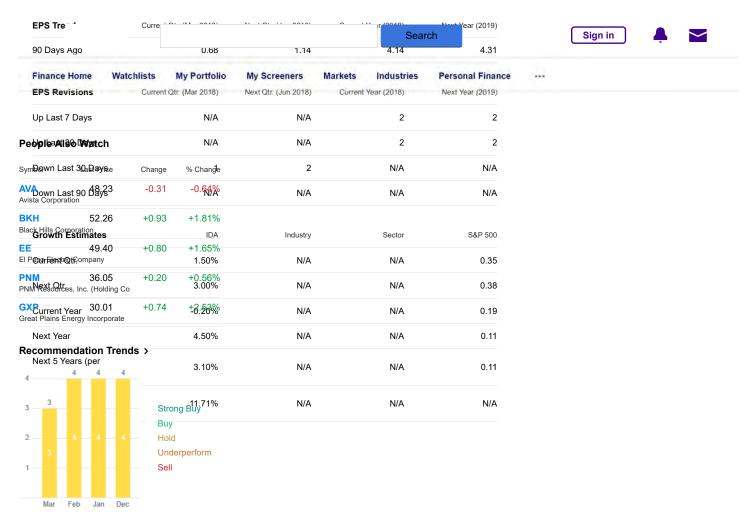


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Recommendation Rating >



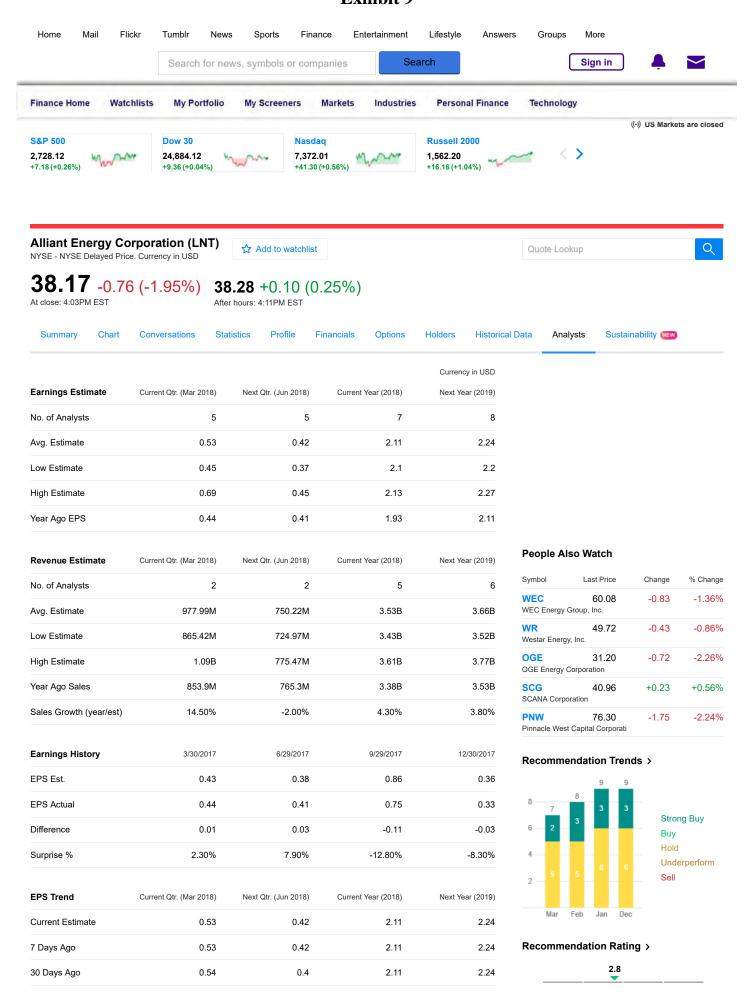
IDA 82.78 1.17 1.43% : IDACORP, Inc. - Yahoo Finance

Analyst Price Targets (3) >

	Average 81.33	
		
Low 79.00	Current 82 78	High 85.00

Upgrades & Downgrades >

Bank of America: to Underperform	1/9/2018
Williams Capital: to Hold	10/18/2016
Ladenburg Thalmann: to Neutral	2/22/2013
Wells Fargo: to Market Perform	1/2/2013
	Underperform Williams Capital: to Hold Ladenburg Thalmann: to Neutral Wells Fargo: to Market

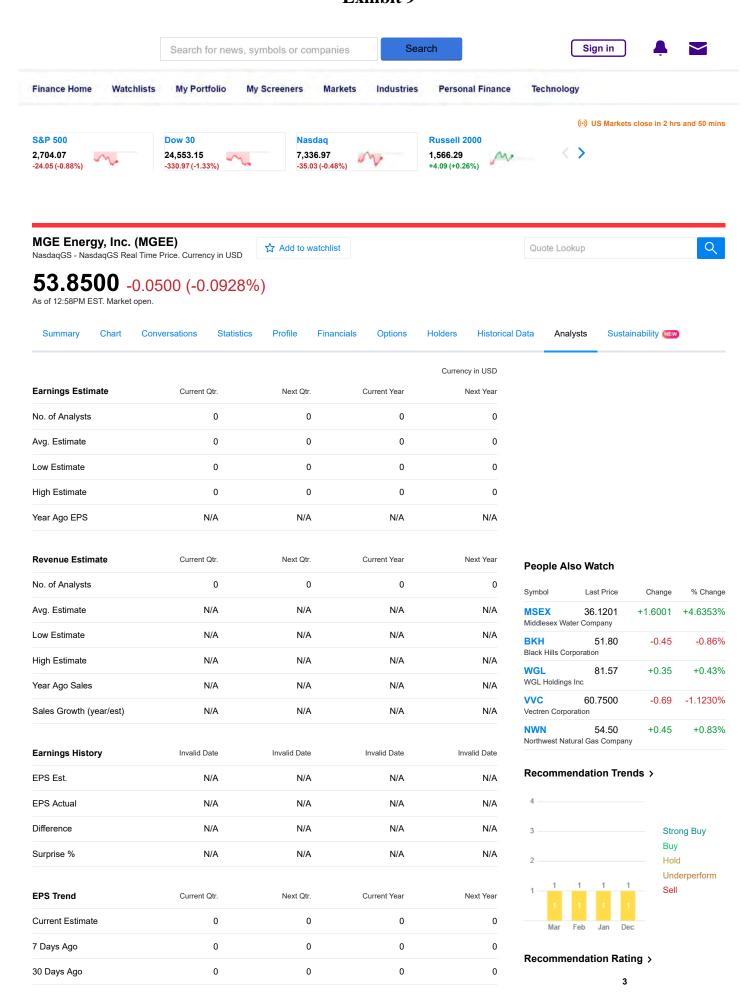


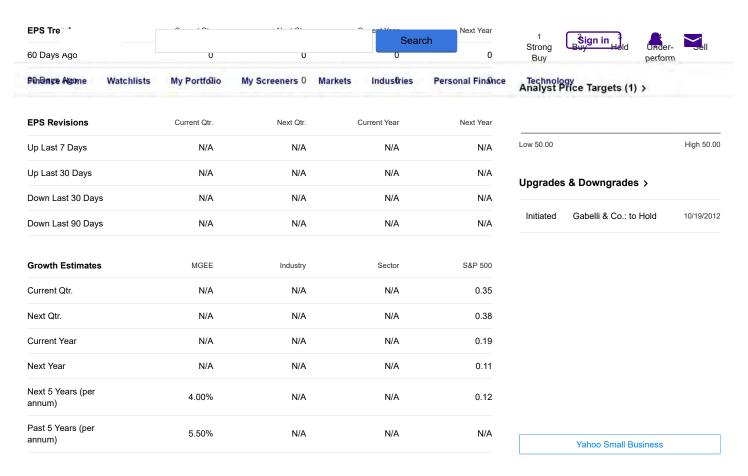
LNT 38.17 -0.76 -1.95% : Alliant Energy Corporation - Yahoo Finance **Exhibit 9**

60 Days					Sear	ch 2.24	Buy	Sign in perform	Sell
90 Days Ago		0.54	0.41		2.13	2.24	Analyst Price	e Targets (6) >	
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance	Technology	Average 40.42	
EPS Revisions	Curre	nt Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current '	Year (2018)	Next Year (2019)	Low 37.00	0	High 43.00
Up Last 7 Days		1	1		1	1		ent 38.17	1 light 40.00
Up Last 30 Days		1	1		1	1	Upgrades &	Downgrades >	
Down Last 30 Days		N/A	2		2	1	Initiated	UBS: to Neutral	2/2/201
Down Last 90 Days		N/A	N/A		N/A	N/A	↓ Downgrade	Wells Fargo: Outperform to Market Perform	12/18/201
Growth Estimates		LNT	Industry		Sector	S&P 500	Initiated	Jefferies: to Hold	5/26/201
Current Qtr.		20.50%	N/A		N/A	0.35	In this second	UPO to Newton	
Next Qtr.		2.40%	N/A		N/A	0.38	Initiated	UBS: to Neutral	3/16/2017
Current Year		9.30%	N/A		N/A	0.19	↓ Downgrade	Macquarie: to Neutral	1/24/201
Next Year		6.20%	N/A		N/A	0.11	Initiated	Guggenheim: to Neutral	11/4/201
Next 5 Years (per annum)		5.45%	N/A		N/A	0.11	Mor	e Upgrades & Downgrades	.
Past 5 Years (per annum)		2.44%	N/A		N/A	N/A			

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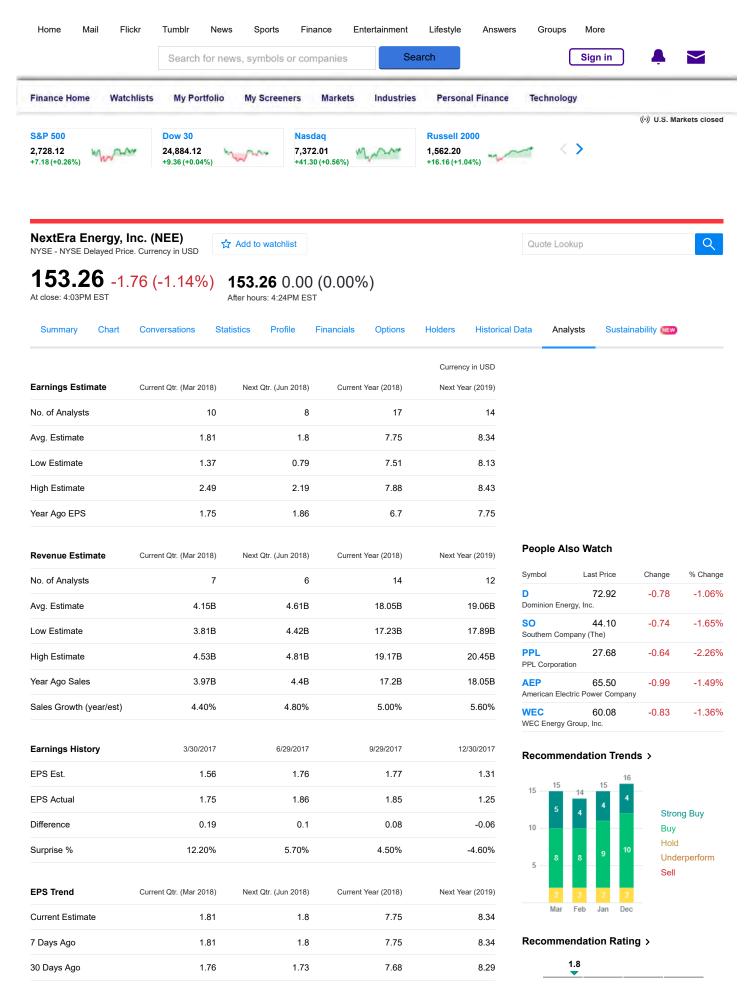
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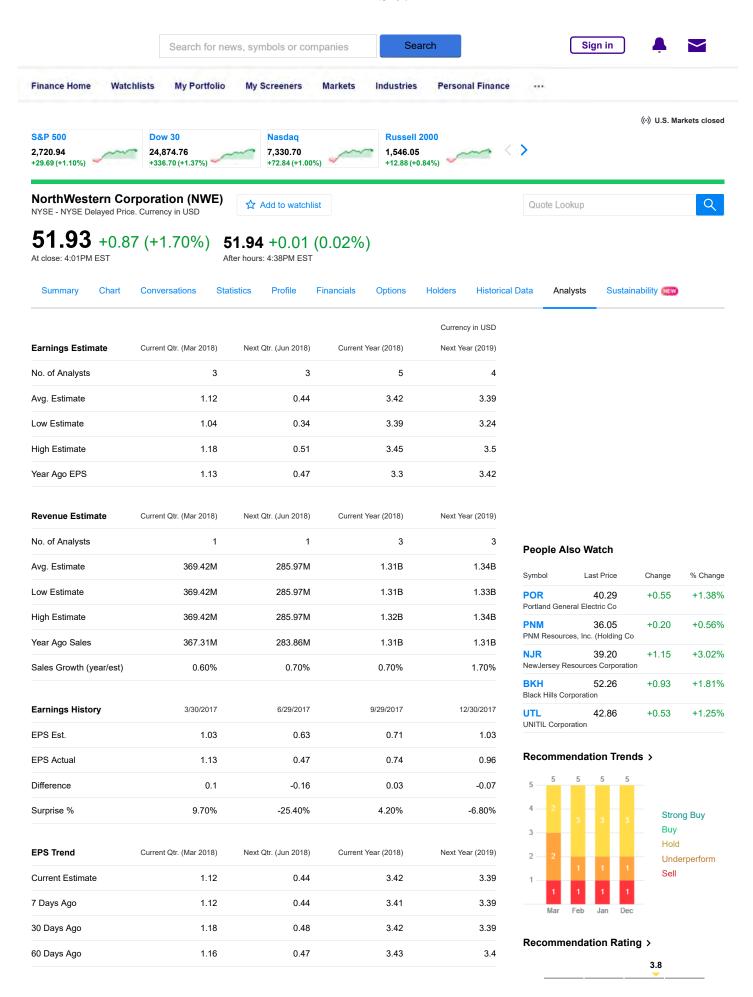
1 of 2



60 Days					Sear	ch 7.78	Buy	Sign in perform	Sell
90 Days Ago		1.92	1.82		7.26	7.78	Analyst Price	e Targets (15) >	
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance	Technology	Average 167,87	
EPS Revisions	Currer	nt Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current Y	'ear (2018)	Next Year (2019)	 Low 152.00	0	High 177.00
Up Last 7 Days		N/A	N/A		N/A	N/A	Current 153	.26	3
Up Last 30 Days		1	1		1	1	Upgrades &	Downgrades >	
Down Last 30 Days		N/A	N/A		N/A	N/A	Initiated	UBS: to Buy	2/2/201
Down Last 90 Days		N/A	N/A		N/A	N/A	Initiated	Credit Suisse: to Outperform	12/7/201
Growth Estimates		NEE	Industry		Sector	S&P 500	↑ Upgrade	Goldman Sachs: Buy to Conviction Buy	10/16/201
Current Qtr.		3.40%	N/A		N/A	0.35	↑ Upgrade	Deutsche Bank: to Buy	1/30/201
Next Qtr.		-3.20%	N/A		N/A	0.38	Popgrado	Bodisono Bank. to Bay	17007201
Current Year		15.70%	N/A		N/A	0.19	↓ Downgrade	Deutsche Bank: to Hold	9/23/201
Next Year		7.60%	N/A		N/A	0.11	↓ Downgrade	Macquarie: to Neutral	4/4/201
Next 5 Years (per annum)		8.85%	N/A		N/A	0.11	Mon	e Upgrades & Downgrade	6
Past 5 Years (per annum)		7.47%	N/A		N/A	N/A			

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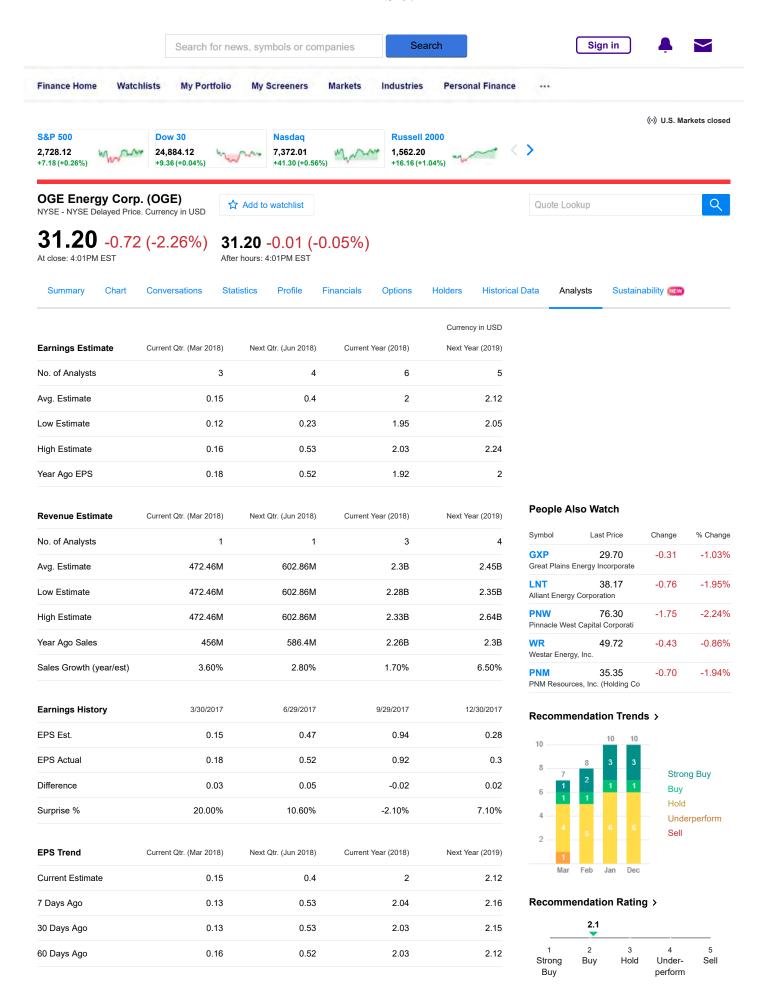


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EPS Tre	Curre	0. 4. 0040	N 101 /1 0010		Sear	ch (2019)	۲	Sign in	\smile
90 Days Ago		1.16	0.47		3.43	3.4	Analyst Pric	e Targets (4) >	
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance	***	Average 52.50	
EPS Revisions	Current	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)		Average 32.00	
Up Last 7 Days		N/A	N/A		1	N/A	Low 49.00	Current 51.93	High 55.00
Up Last 30 Days		N/A	1		2	1	Ungrades &	Downgrades >	
Down Last 30 Days		N/A	N/A		N/A	N/A	opgrades a	Downgrades /	
Down Last 90 Days		N/A	N/A		N/A	N/A	↓ Downgrade	Williams Capital: Hold to Sell	7/31/2017
Growth Estimates		NWE	Industry		Sector	S&P 500	↓ Downgrade	Credit Suisse: Neutral to Underperform	7/24/2017
Current Qtr.		-0.90%	N/A		N/A	0.35	Initiated	Credit Suisse: to Neutral	1/25/2017
Next Qtr.		-6.40%	N/A		N/A	0.38	Initiated	Mizuho: to Neutral	3/31/2016
Current Year		3.60%	N/A		N/A	0.19	I B	Ladenburg Thalmann: to	10/21/2015
Next Year		-0.90%	N/A		N/A	0.11	↓ Downgrade	Neutral	10/21/2015
Next 5 Years (per annum)		3.12%	N/A		N/A	0.11	↓ Downgrade	Bank of America: to Underperform	7/8/2015
Past 5 Years (per annum)		8.34%	N/A		N/A	N/A	More	e Upgrades & Downgrades	

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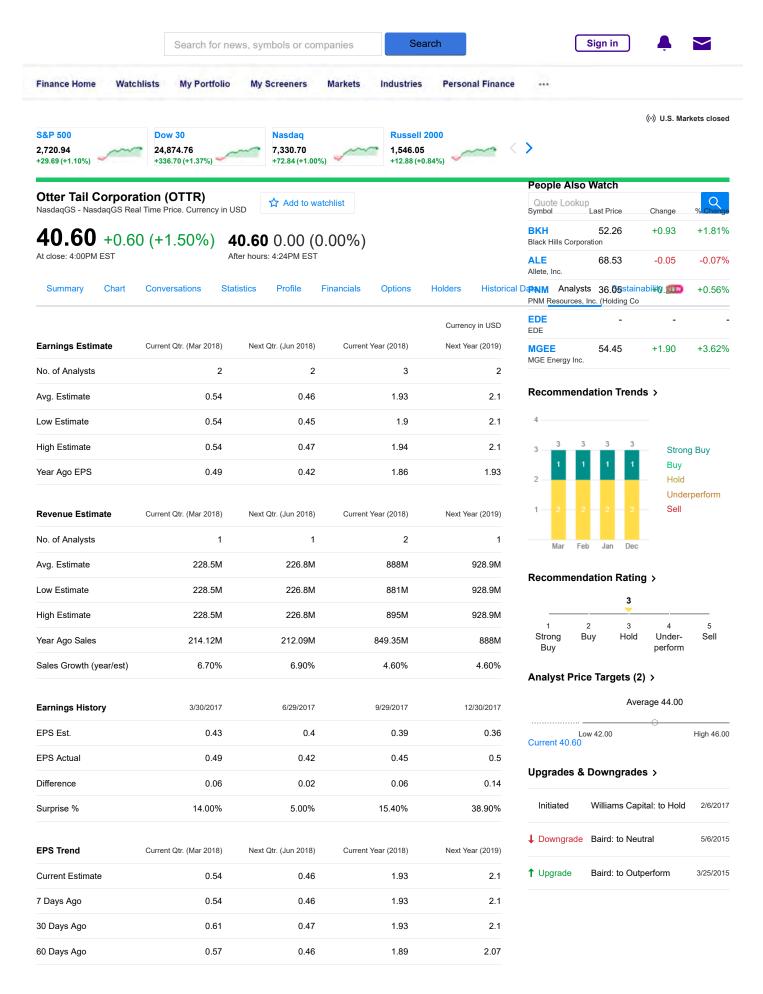
OGE 31.20 -0.72 -2.26% : OGE Energy Corporation - Yahoo Finance **Exhibit 9**

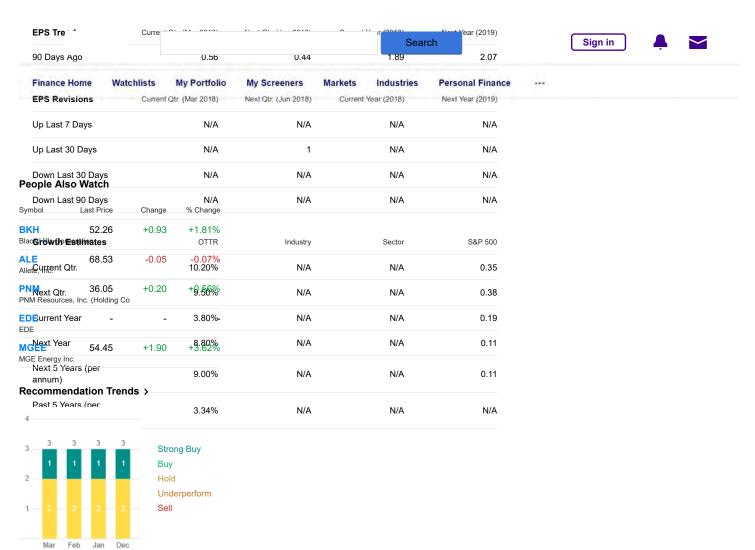
EPS Tre	Curre		N . O. // 0040		Y (2040) Sear	rch (2019)	Analyst Pric	e Targets (6) >	$\overline{}$
90 Days Ago		0.16	0.51		2.03	2.11		Average 34.50	
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance	Current 31.20	ow 32.00	High 38.00
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)	Odifoli o 1.20		
Up Last 7 Days		N/A	N/A		2	1	Upgrades &	Downgrades >	
Up Last 30 Days		1	1		2	1	Initiated	UBS: to Neutral	2/2/2018
Down Last 30 Days		1	1		2	1		Bank of America:	
Down Last 90 Days		N/A	N/A		N/A	N/A	↑ Upgrade	Underperform to Neutral	1/18/2018
							↑ Upgrade	Goldman Sachs: Neutral to Buy	1/11/2018
Growth Estimates		OGE	Industry		Sector	S&P 500	↓ Downgrade	Edward Jones: Buy to	12/27/2017
Current Qtr.		-16.70%	N/A		N/A	0.35	→ Downgrade	Hold	12/2//2017
Next Qtr.		-23.10%	N/A		N/A	0.38	↓ Downgrade	Wells Fargo: Outperform to Market Perform	10/6/2017
Current Year		4.20%	N/A		N/A	0.19	Initiated	Evercore ISI Group: to Outperform	7/24/2017
Next Year		6.00%	N/A		N/A	0.11		Сифененн	
Next 5 Years (per annum)		5.80%	N/A		N/A	0.11	Mon	e Upgrades & Downgrades	
Past 5 Years (per annum)		5.45%	N/A		N/A	N/A			

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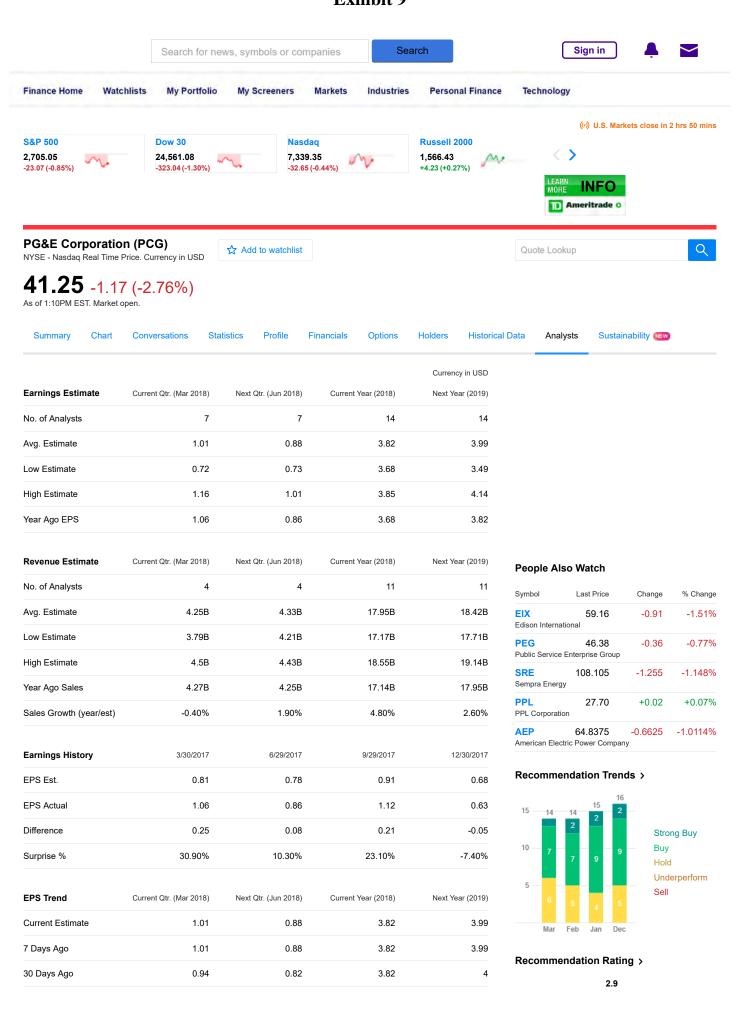


Analyst Price Targets (2) >



Upgrades & Downgrades >

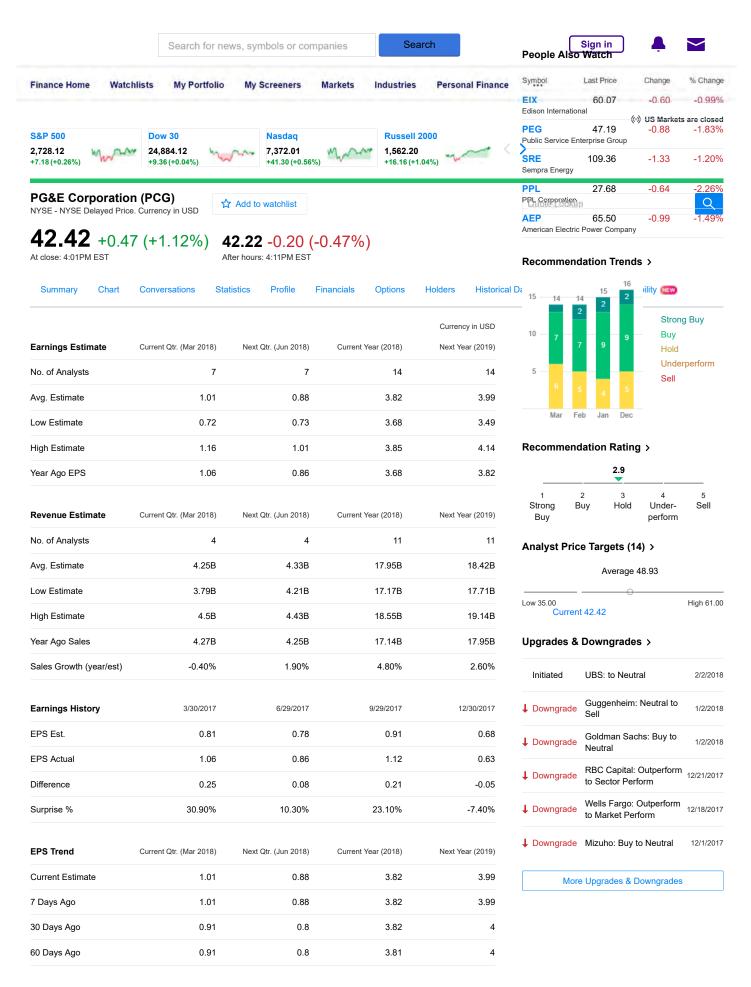
Initiated	Williams Capital: to Hold	2/6/2017
↓ Downgrade	Baird: to Neutral	5/6/2015
↑ Upgrade	Baird: to Outperform	3/25/2015

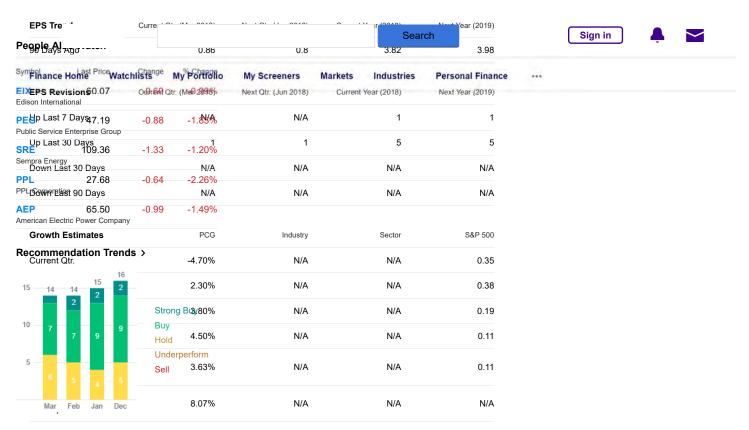


60 Days Ago	Curre	0.91	0.8	^ ''	Sear 3.81	ch (2019)	1 Strong Buy	Sign in Hold Unde	r- Sell
Findage Agome	Watchlists	My Poltfolio	My Screener 9.8	Markets	Indu8tries	Personal Rinance	Technology Analyst Price	e Targets (14) >	
EPS Revisions	Current Qtr. (Mar 2018)		Next Qtr. (Jun 2018)	Current Year (2018)		Next Year (2019)	Average 48.93		
Up Last 7 Days		N/A	N/A		1	1	Low 35.00 Current 4	1.28	High 61.00
Up Last 30 Days	1		1	1 5		5	Upgrades & Downgrades >		
Down Last 30 Days	3	N/A	N/A		N/A	N/A			
Down Last 90 Days	3	N/A	N/A		N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
							↓ Downgrade	Guggenheim: Neutral Sell	to 1/2/2018
Growth Estimates Current Qtr.		PCG -4.70%	Industry N/A		Sector N/A	S&P 500 0.35	↓ Downgrade	Goldman Sachs: Buy t Neutral	o _{1/2/2018}
Next Qtr.		2.30%	N/A		N/A	0.38	↓ Downgrade	RBC Capital: Outperfo	rm _{12/21/2017}
Current Year		3.80%	N/A		N/A	0.19	↓ Downgrade	Wells Fargo: Outperform	m _{12/18/2017}
Next Year		4.50%	N/A		N/A	0.11		to Market Perform	
Next 5 Years (per annum)		3.63%	N/A		N/A	0.12	↓ Downgrade	Mizuho: Buy to Neutra	12/1/2017
Past 5 Years (per annum)		8.07%	N/A		N/A	N/A	More	e Upgrades & Downgrad	les

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Analyst Price Targets (14) >

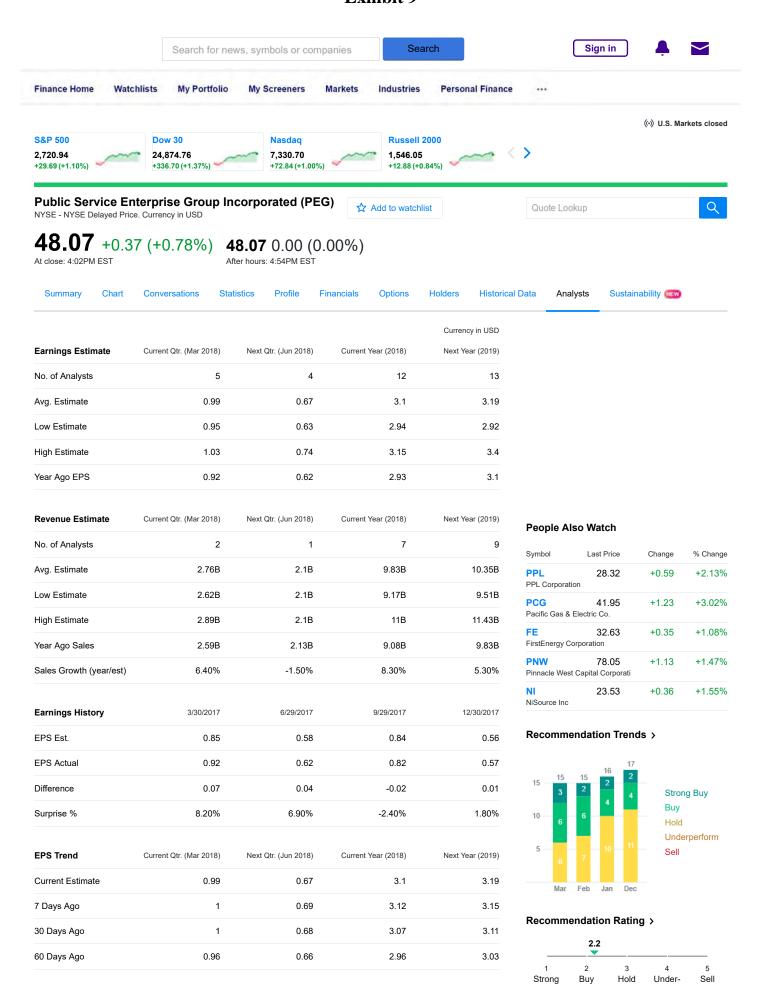
Average 48.93

	-	
Low 35.00		High 61.00
Current 42 42		

Upgrades & Downgrades >

Initiated	UBS: to Neutral	2/2/2018
↓ Downgrade	Guggenheim: Neutral to Sell	1/2/2018
↓ Downgrade	Goldman Sachs: Buy to Neutral	1/2/2018
↓ Downgrade	RBC Capital: Outperform to Sector Perform	12/21/2017
↓ Downgrade	Wells Fargo: Outperform to Market Perform	12/18/2017
↓ Downgrade	Mizuho: Buy to Neutral	12/1/2017

More Upgrades & Downgrades



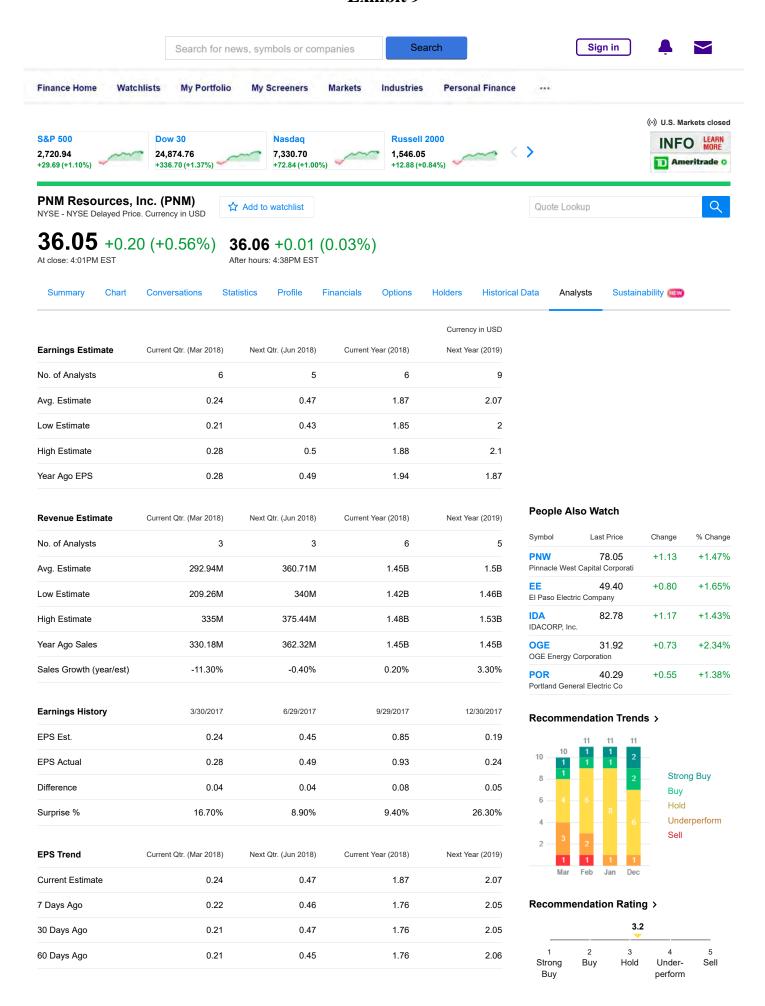
PEG 48.07 0.37 0.78% : Public Service Enterprise Group - Yahoo Finance **Exhibit 9**

EPS Tre	Curre		11 101 (1 0010)	·	Sear	ear (2019)	Analyst Pric	Sīgarģets (14) 🚣	~
90 Days Ago		0.96	0.66		2.96	2.98	,	Average 52.86	_
Finance Home	Watchlists	My Portfolio	My Screeners	Markets	Industries	Personal Finance			
EPS Revisions	Curren	t Qtr. (Mar 2018)	Next Qtr. (Jun 2018)	Current	Year (2018)	Next Year (2019)	Low 47.00 Current 4	8.07	High 57.00
Up Last 7 Days		N/A	N/A		N/A	1	Unarados 8	Downgrades >	
Up Last 30 Days		2	3		5	7	opgrades &	Downgrades >	
Down Last 30 Days		N/A	N/A		2	1	↓ Downgrade	Mizuho: Buy to Neutral	2/5/2018
Down Last 90 Days		N/A	N/A		N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Growth Estimates		PEG	Industry		Sector	S&P 500	↑ Upgrade	Macquarie: Neutral to Outperform	1/22/2018
Current Qtr.		7.60%	N/A		N/A	0.35	↑ Upgrade	Wells Fargo: Market Perform to Outperform	11/1/2017
Next Qtr.		8.10%	N/A		N/A	0.38	↑ Upgrade	Barclays: Equal-Weight to	9/22/2017
Current Year		5.80%	N/A		N/A	0.19	1 Opgrade	Overweight	5/22/2011
Next Year		2.90%	N/A		N/A	0.11	↑ Upgrade	Morgan Stanley: Equal- Weight to Overweight	9/21/2017
Next 5 Years (per annum)		3.39%	N/A		N/A	0.11	More	e Upgrades & Downgrades	
Past 5 Years (per annum)		4.02%	N/A		N/A	N/A			

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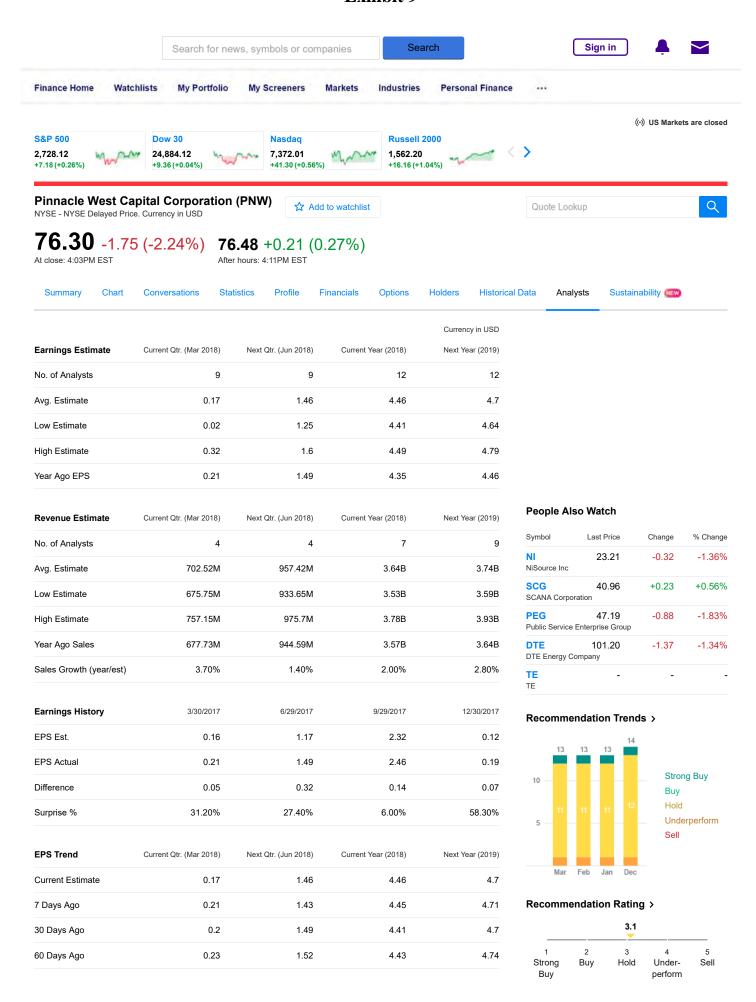


EPS Tre	Curre		11 . 0. / 1 . 00.400	~	Sear	Ch (2019)	_	e Targets (8) >	~
90 Days Ago		0.24	0.45		1.76	2.07	Av	erage 36.25	
Finance Home EPS Revisions	Watchlists	My Portfolio	My Screeners Next Qtr. (Jun 2018)	Markets	Industries Year (2018)	Personal Finance Next Year (2019)	Low-94.00	rent 36.05	High 40.00
Up Last 7 Days	Carren	3	3	Carrent	5	3	Upgrades &	Downgrades >	
Up Last 30 Days		3	3		5	3	Initiated	UBS: to Sell	2/2/2018
Down Last 30 Days		1	1		1	1		Mizuho: Underperform to	
Down Last 90 Days		N/A	N/A		N/A	N/A	↑ Upgrade	Neutral	1/23/2018
					_		Initiated	Bank of America: to Underperform	10/24/2017
Growth Estimates Current Qtr.		-14.30%	Industry N/A		Sector N/A	S&P 500 0.35	↓ Downgrade	Evercore ISI Group: In- Line to Underperform	9/26/2017
Next Qtr.		-4.10%	N/A		N/A	0.38	↓ Downgrade	Ladenburg Thalmann: Buy to Neutral	8/18/2017
Current Year		-3.60%	N/A		N/A	0.19	↓ Downgrade	RBC Capital: Outperform	8/18/2017
Next Year		10.70%	N/A		N/A	0.11	↓ Domigrano	to Sector Perform	
Next 5 Years (per annum)		5.80%	N/A		N/A	0.11	More	e Upgrades & Downgrades	
Past 5 Years (per annum)		10.97%	N/A		N/A	N/A			

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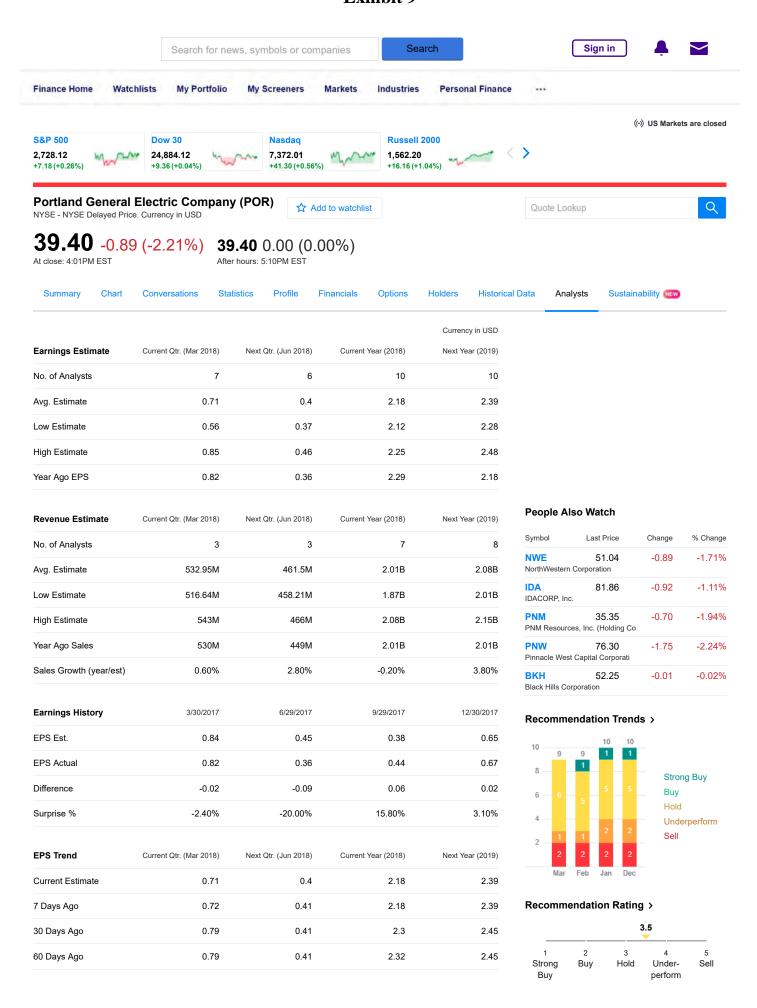
2 of 2 **Exhibit 9 Page 66** 3/5/2018, 4:38 PM



EPS Tre Curre		11 . 0. /1 . 0040	Sea	rch (2019)	· · ·	e Targets (12) >	~
90 Days Ago	0.22	1.52	4.4	4.71		Averáge 82.50	
Finance Home Watchlists EPS Revisions Curre	My Portfolio ent Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low 76.00 Current 76.30	0	High 88.00
Up Last 7 Days	4	5	N/A	3	Upgrades &	Downgrades >	
Up Last 30 Days	4	5	10	3	↓ Downgrade	Wells Fargo: Outperform	2/26/2018
Down Last 30 Days	3 N/A	1 N/A	N/A N/A	4 N/A	↑ Upgrade	Morgan Stanley: Underweight to Equal- Weight	2/13/2018
					Initiated	UBS: to Neutral	2/2/2018
Growth Estimates Current Qtr.	-19.00%	Industry N/A	Sector N/A	S&P 500 0.35	↓ Downgrade	Bank of America: Neutral to Underperform	1/3/2018
Next Qtr.	-2.00%	N/A	N/A	0.38	↓ Downgrade	Williams Capital: to Hold	3/7/2017
Current Year	2.50%	N/A	N/A	0.19	† Upgrade	Goldman Sachs: to Neutra	al 1/17/2017
Next Year	5.40%	N/A	N/A	0.11			
Next 5 Years (per annum)	3.63%	N/A	N/A	0.11	More	e Upgrades & Downgrades	
Past 5 Years (per annum)	7.63%	N/A	N/A	N/A			

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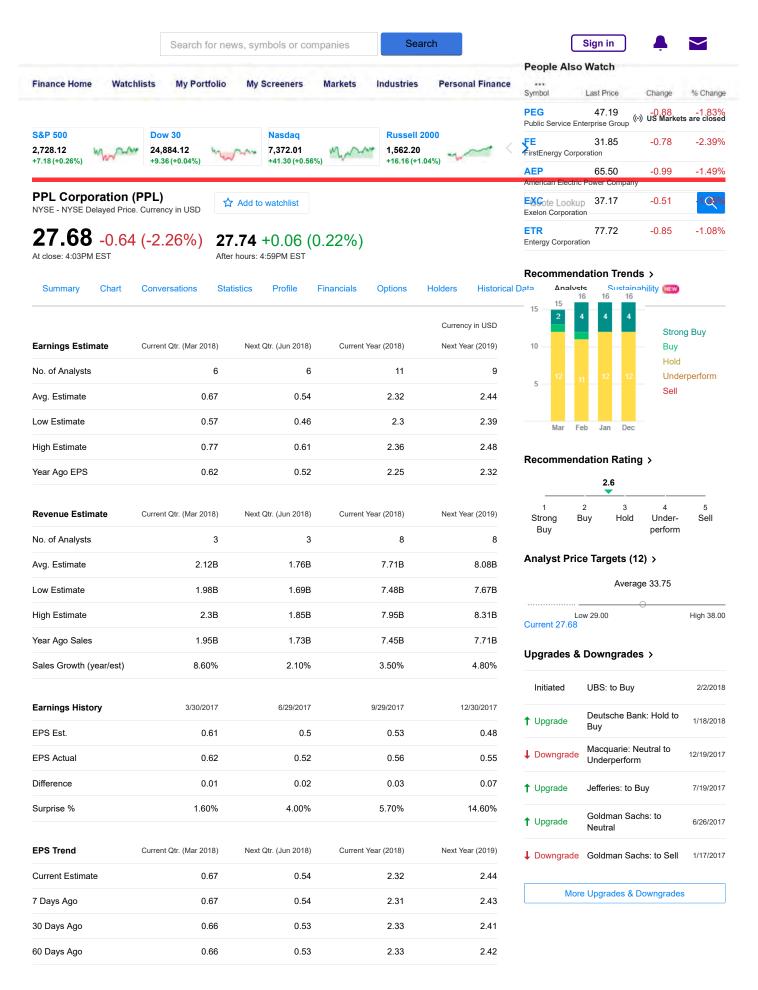
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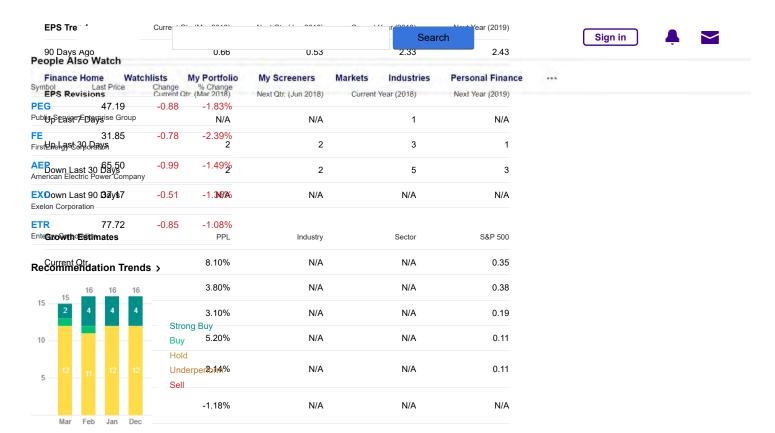


EPS Tre Curi	re : 0: /11 0010		Sea	rch (2019)	, L	e Targets (9) >	~
90 Days Ago	0.79	0.41	2.32	2.45		Average 41.33	
Finance Home Watchlists EPS Revisions Cun	My Portfolio rent Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low 98.00 Curre	nt 39.40	High 46.00
Up Last 7 Days	N/A	N/A	N/A	N/A	Upgrades &	Downgrades >	
Up Last 30 Days	2	2	N/A	N/A	Initiated	Mizuho: to Buy	2/15/2018
Down Last 30 Days	1	1	N/A	N/A	Initiated	UBS: to Sell	2/2/2018
Down Last 90 Days	N/A	N/A	N/A	N/A		Williams Capital: Hold to	
Growth Estimates	POR	Industry	Sector	S&P 500	↓ Downgrade	Sell	7/24/2017
Current Qtr.	-13.40%	N/A	N/A	0.35	↑ Upgrade	JP Morgan: to Neutral	12/16/2016
Next Qtr.	11.10%	N/A	N/A	0.38	↓ Downgrade	Bank of America: to Underperform	11/22/2016
Current Year	-4.80%	N/A	N/A	0.19	Initiated	Guggenheim: to Neutral	11/4/2016
Next Year	9.60%	N/A	N/A	0.11			
Next 5 Years (per annum)	2.70%	N/A	N/A	0.11	More	e Upgrades & Downgrades	
Past 5 Years (per annum)	5.40%	N/A	N/A	N/A			

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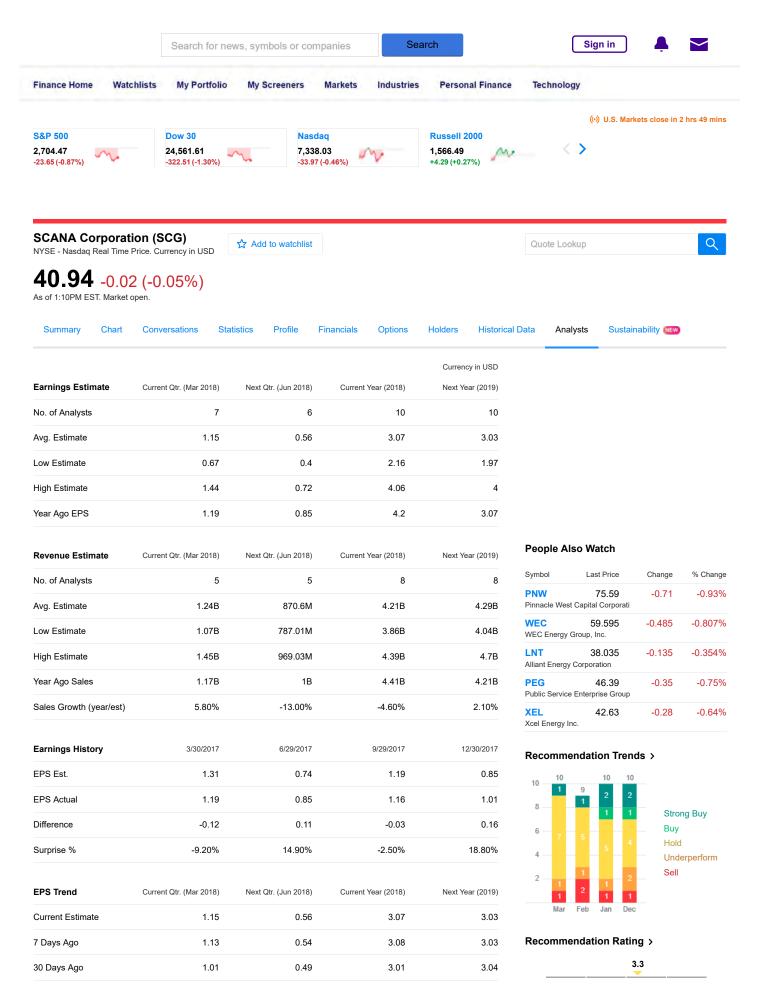


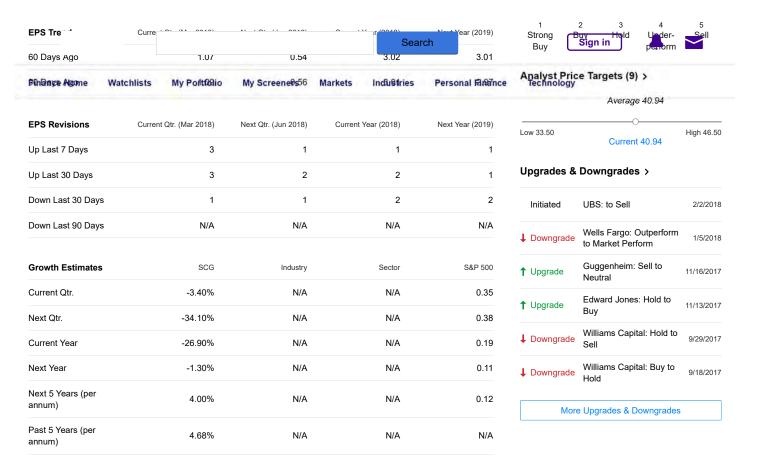
Analyst Price Targets (12) >

Average 33.75 Low 29.00 High 38.00 Current 27.68

Upgrades & Downgrades >

Initiated	UBS: to Buy	2/2/2018
↑ Upgrade	Deutsche Bank: Hold to Buy	1/18/2018
↓ Downgrade	Macquarie: Neutral to Underperform	12/19/2017
↑ Upgrade	Jefferies: to Buy	7/19/2017
↑ Upgrade	Goldman Sachs: to Neutral	6/26/2017
↓ Downgrade	Goldman Sachs: to Sell	1/17/2017
More	e Upgrades & Downgrades	 }

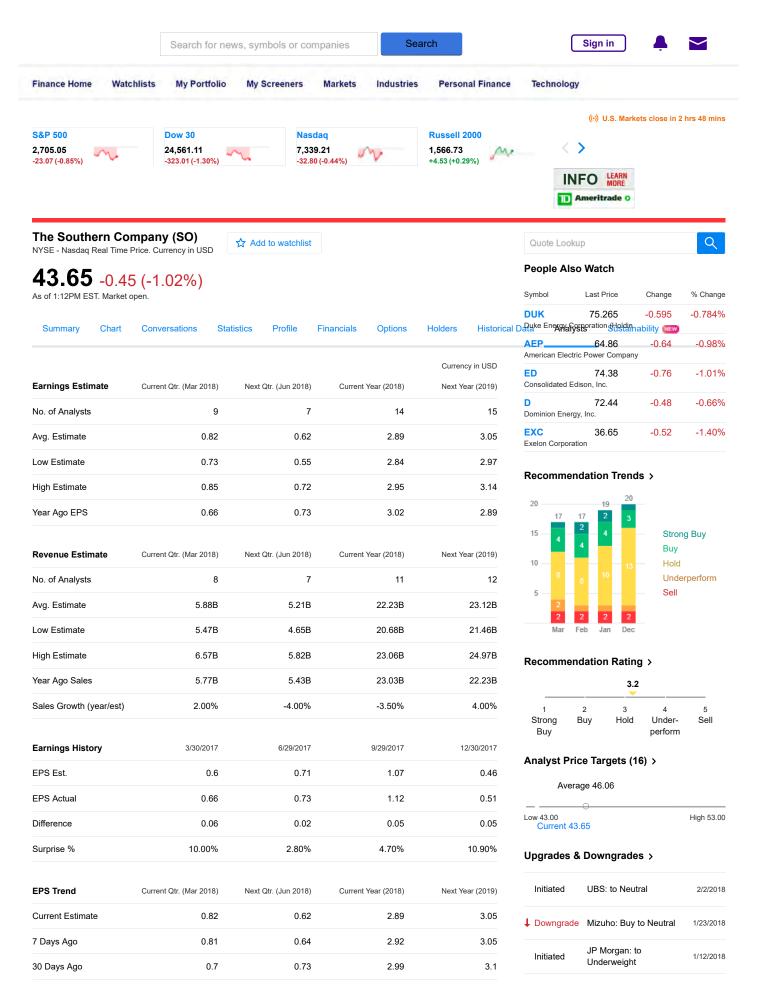


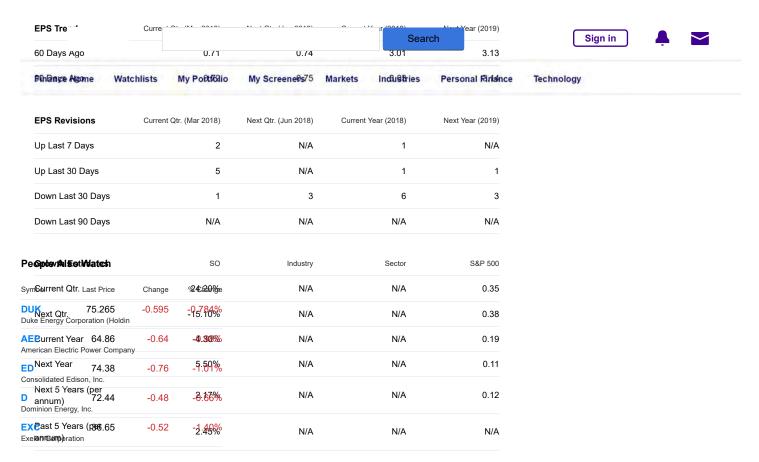


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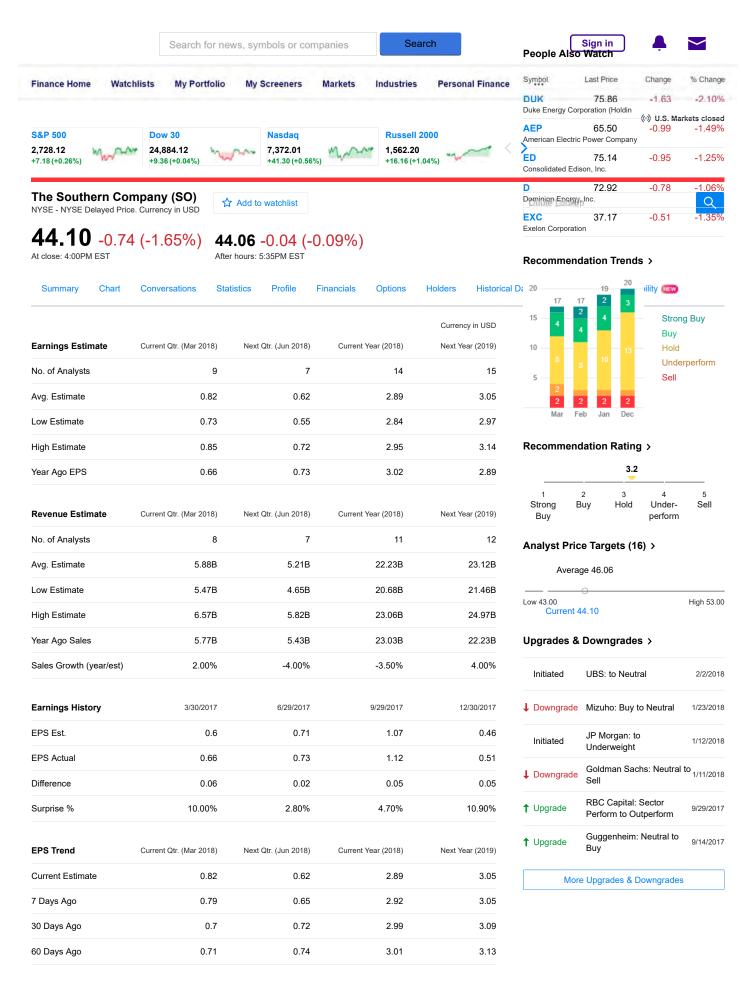


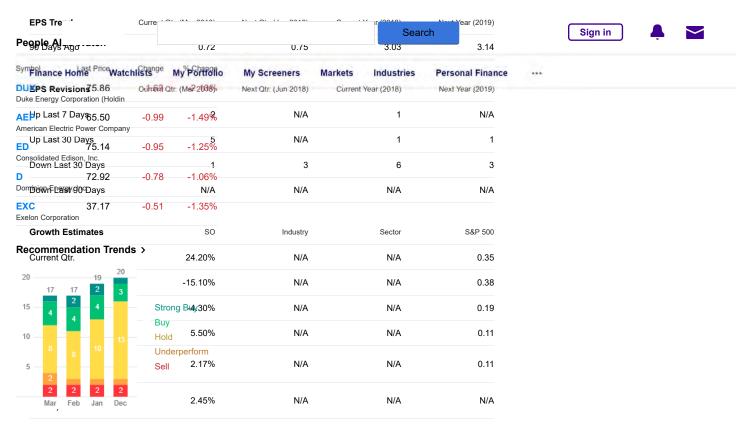
Analyst Price Targets (16) >

Average 46.0	6
Low 43.00 Current 43.65	High 53.00

Upgrades & Downgrades >

	Initiated	UBS: to Neutral	2/2/2018
ţ	Downgrade	Mizuho: Buy to Neutral	1/23/2018
	Initiated	JP Morgan: to Underweight	1/12/2018





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Analyst Price Targets (16) >

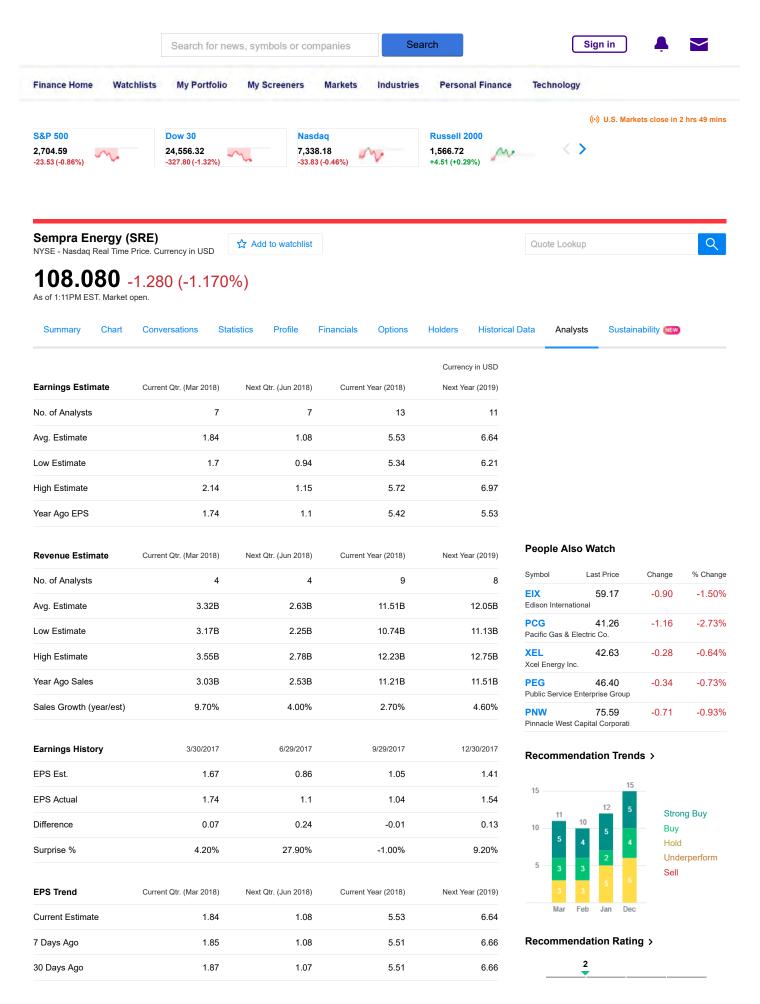
Average 46.06

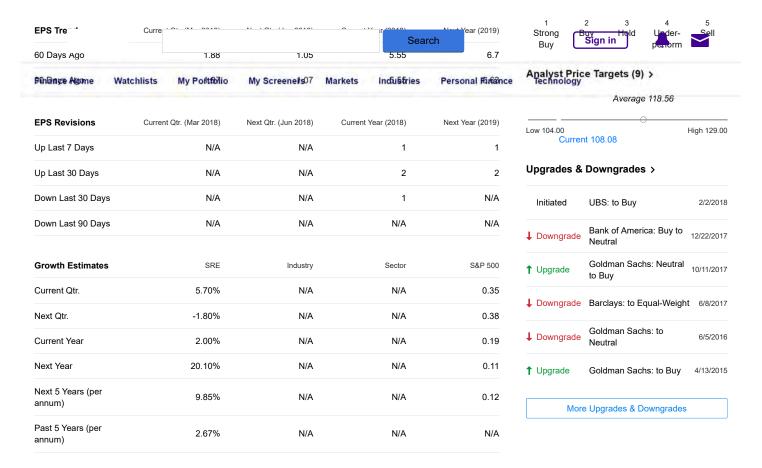
	
Low 43.00	High 53.00
Current 44.10	

Upgrades & Downgrades >

Initiated	UBS: to Neutral	2/2/2018
↓ Downgrade	Mizuho: Buy to Neutral	1/23/2018
Initiated	JP Morgan: to Underweight	1/12/2018
↓ Downgrade	Goldman Sachs: Neutral	to 1/11/2018
↑ Upgrade	RBC Capital: Sector Perform to Outperform	9/29/2017
↑ Upgrade	Guggenheim: Neutral to Buy	9/14/2017

More Upgrades & Downgrades

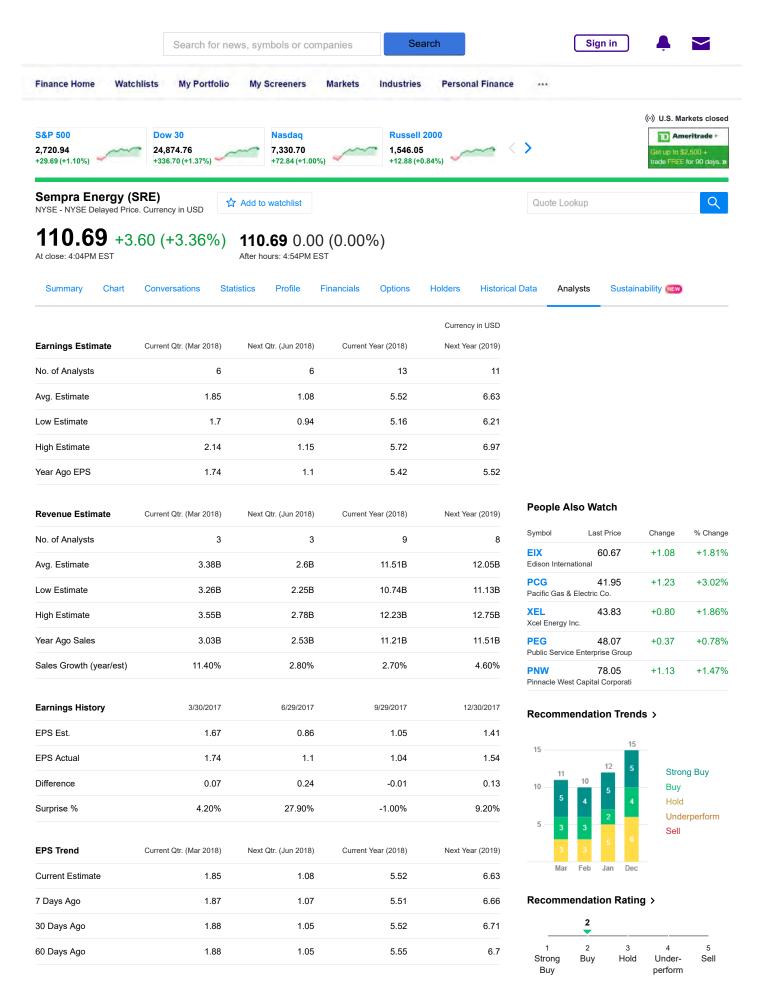




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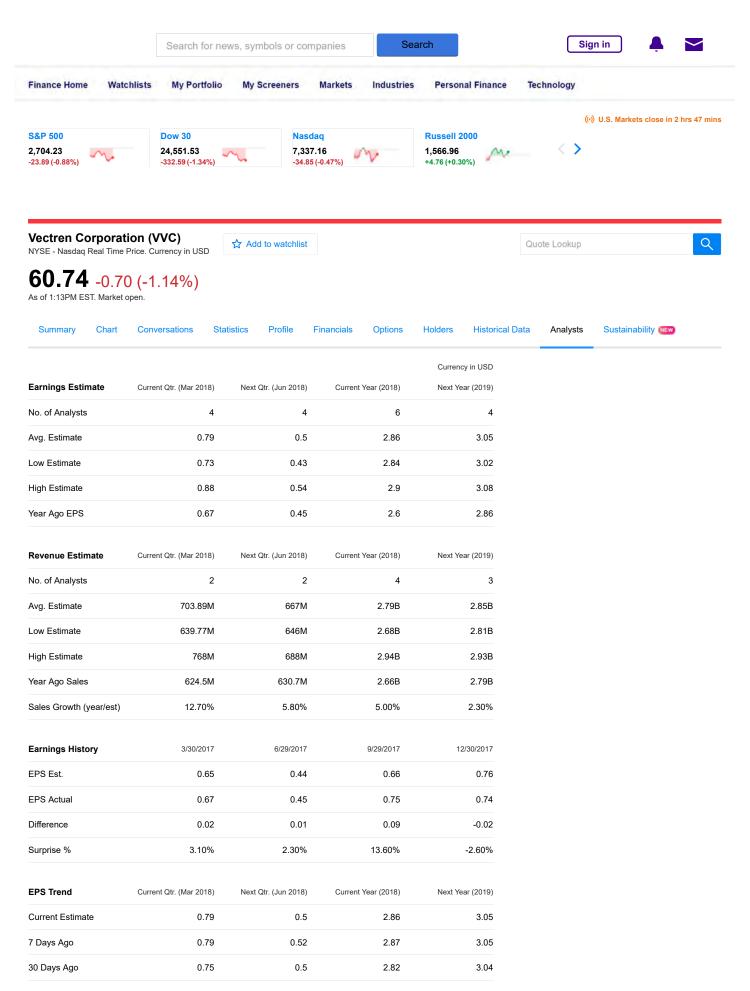


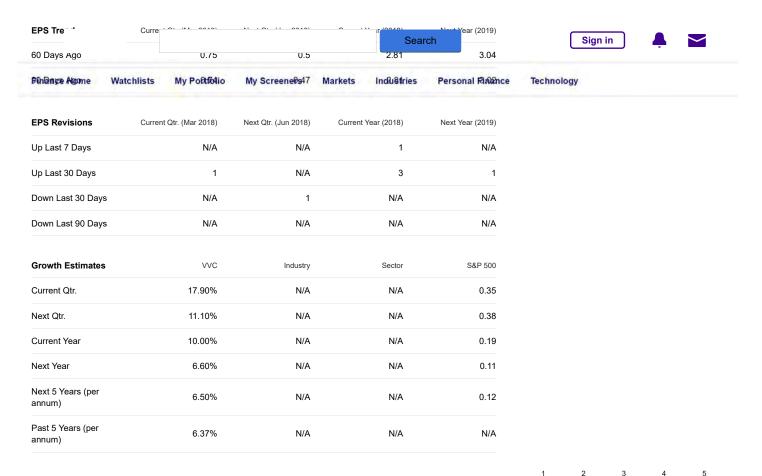
EPS Tre	Curre	. 0. (1. 0010)	N 101 (1 2010)	r (0010)	Search (2019)	Analyst Pric	ce Targets (9) >	\sim
90 Days Ago		1.87	1.07	5.55	6.63		Average 119.44	
Finance Home EPS Revisions	Watchlists Curren	My Portfolio at Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industri Current Year (2018)	Personal Finance Next Year (2019)	Current 110.69	ow 111.00	High 129.00
Up Last 7 Days		N/A	N/A	N/A	N/A	Upgrades &	Downgrades >	
Up Last 30 Days		N/A	N/A	1	1	Initiated	UBS: to Buy	2/2/2018
Down Last 30 Days		N/A	N/A	1	N/A	↓ Downgrade	Bank of America: Buy to	12/22/2017
Down Last 90 Days		N/A	N/A	N/A	N/A	↑ Upgrade	Neutral Goldman Sachs: Neutra to Buy	I 10/11/2017
Growth Estimates		SRE	Industry	Sector	S&P 500	↓ Downgrade	•	ht 6/9/2017
Current Qtr.		6.30%	N/A	N/A	0.35	Downgrade	Barciays. to Equal-Weig	111 0/0/2017
Next Qtr.		-1.80%	N/A	N/A	0.38	↓ Downgrade	Goldman Sachs: to Neutral	6/5/2016
Current Year		1.80%	N/A	N/A	0.19	↑ Upgrade	Goldman Sachs: to Buy	4/13/2015
Next Year		20.10%	N/A	N/A	0.11			
Next 5 Years (per annum)		9.85%	N/A	N/A	0.11	Mor	e Upgrades & Downgrade	S
Past 5 Years (per annum)		2.67%	N/A	N/A	N/A			

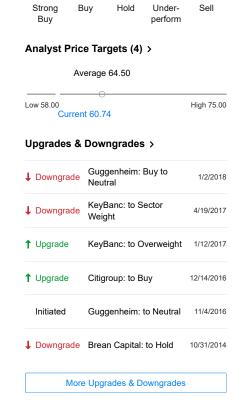
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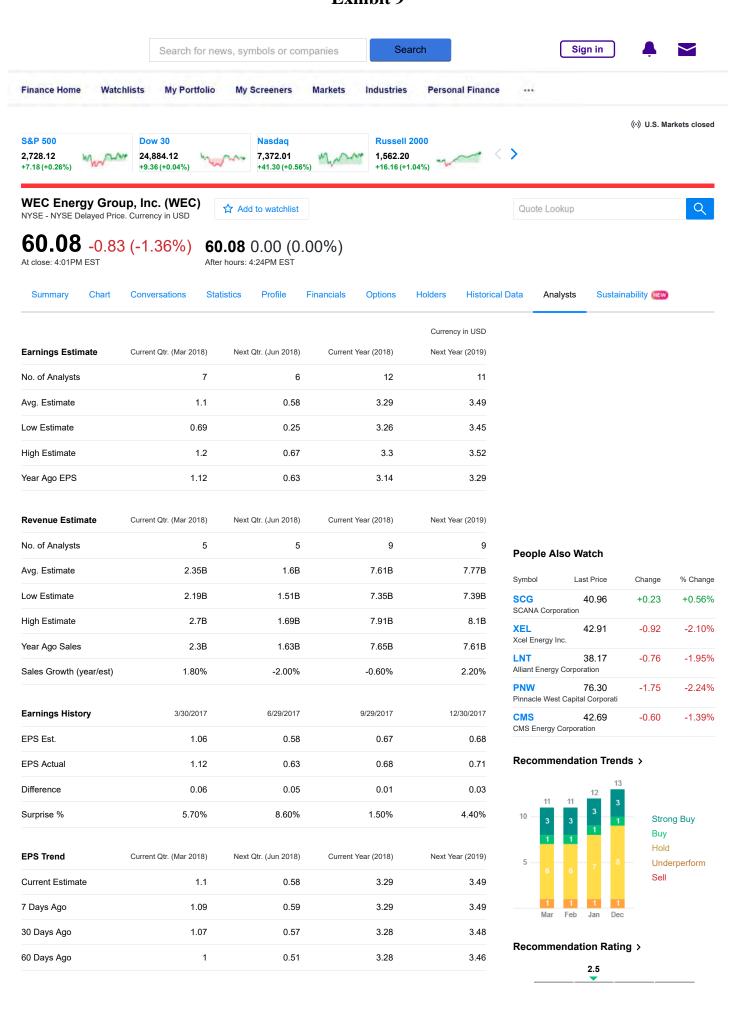
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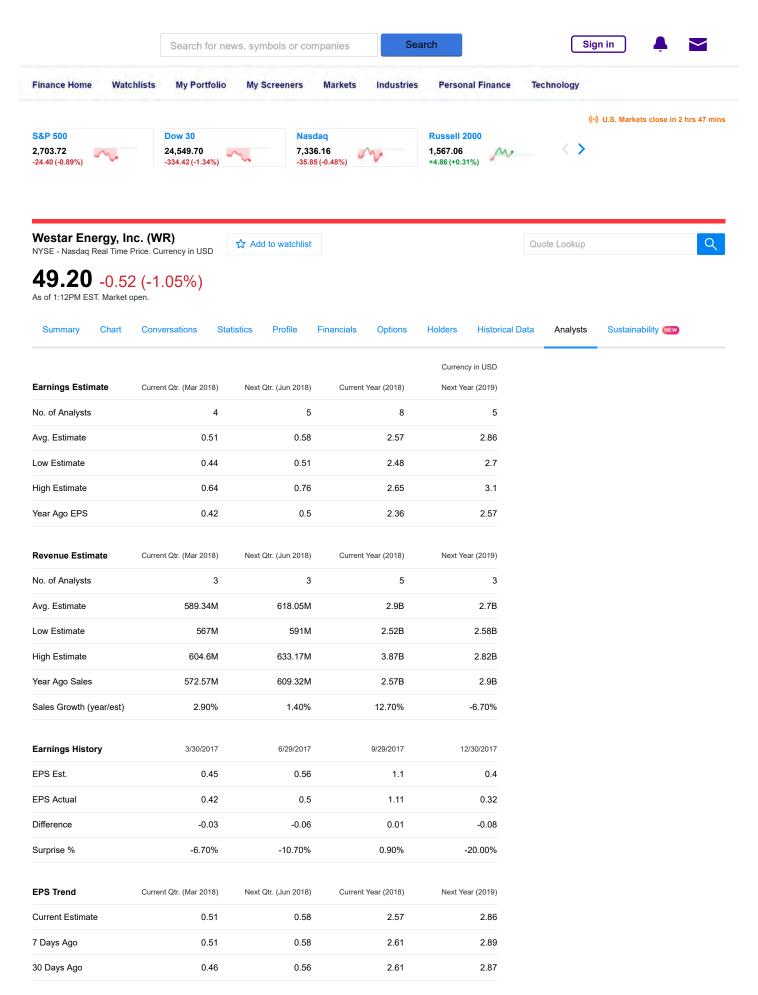


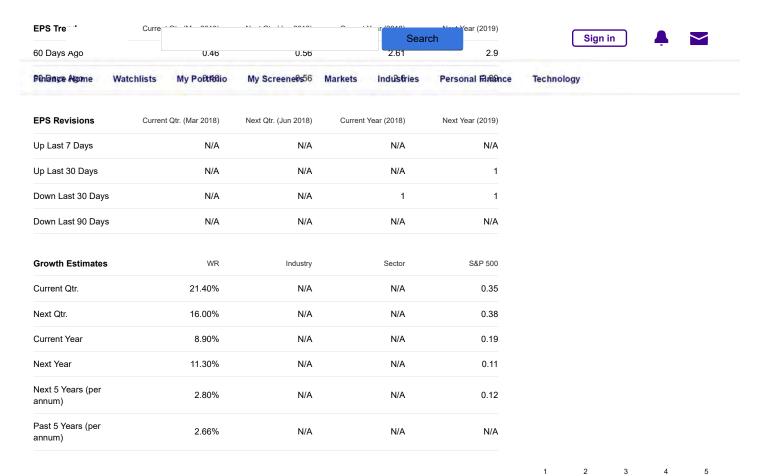


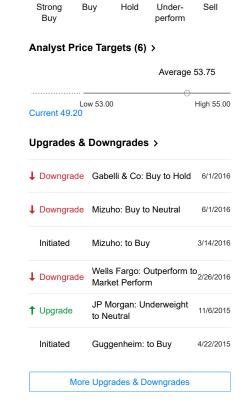
EPS Tre Cur	re ' 0' ' 00' 00'		Sear	ch (2019)		Sign in	~
90 Days Ago	1.04	0.56	3.28	3.46	Analyst Pric	e Targets (9) >	
Finance Home Watchlists EPS Revisions Cur	My Portfolio rent Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)		Average 65.11	
Up Last 7 Days	1	N/A	1	N/A	Lo Current 60.08	ow 63.00	High 71.00
Up Last 30 Days	2	1	2	1			
Down Last 30 Days	N/A	1	N/A	N/A	Upgrades &	Downgrades >	
Down Last 90 Days	N/A	N/A	N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Growth Estimates	WEC	Industry	Sector	S&P 500	Initiated	Credit Suisse: to Neutral	12/7/2017
Current Qtr.	-1.80%	N/A	N/A	0.35	↓ Downgrade	Goldman Sachs: to Sell	6/26/2017
Next Qtr.	-7.90%	N/A	N/A	0.38	↓ Downgrade	Mizuho: to Neutral	2/2/2017
Current Year	4.80%	N/A	N/A	0.19	location and	Our mark in the Burn	44/4/0040
Next Year	6.10%	N/A	N/A	0.11	Initiated	Guggenheim: to Buy	11/4/2016
Next 5 Years (per annum)	4.34%	N/A	N/A	0.11	↑ Upgrade	UBS: to Neutral	5/9/2016
Past 5 Years (per annum)	5.48%	N/A	N/A	N/A	Mor	e Upgrades & Downgrades	

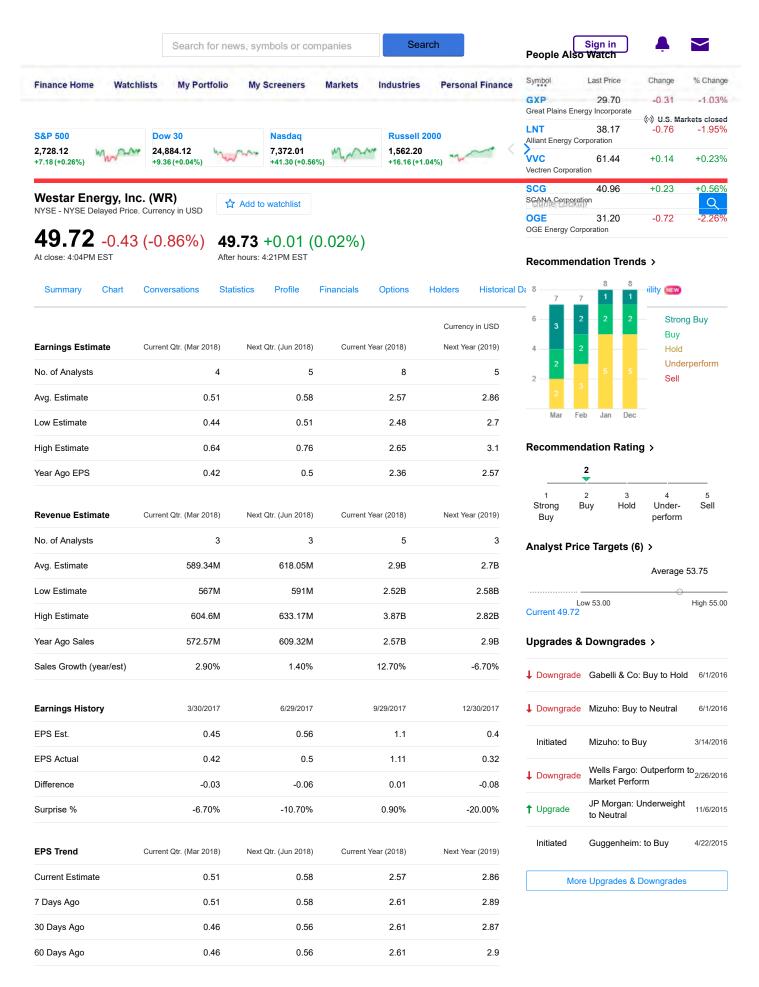
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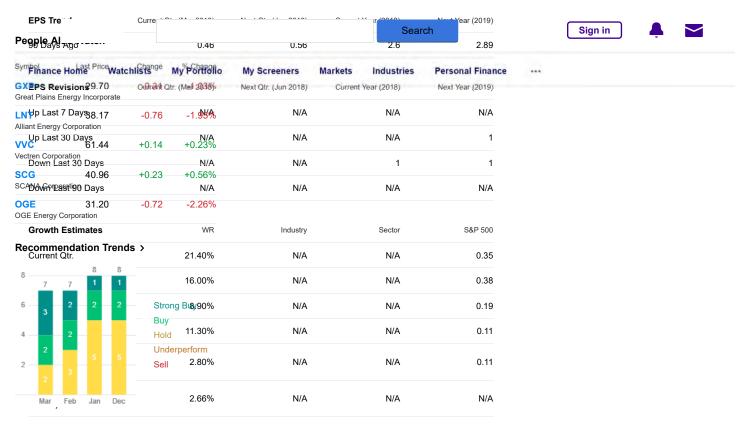
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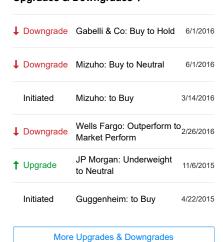
Recommendation Rating >

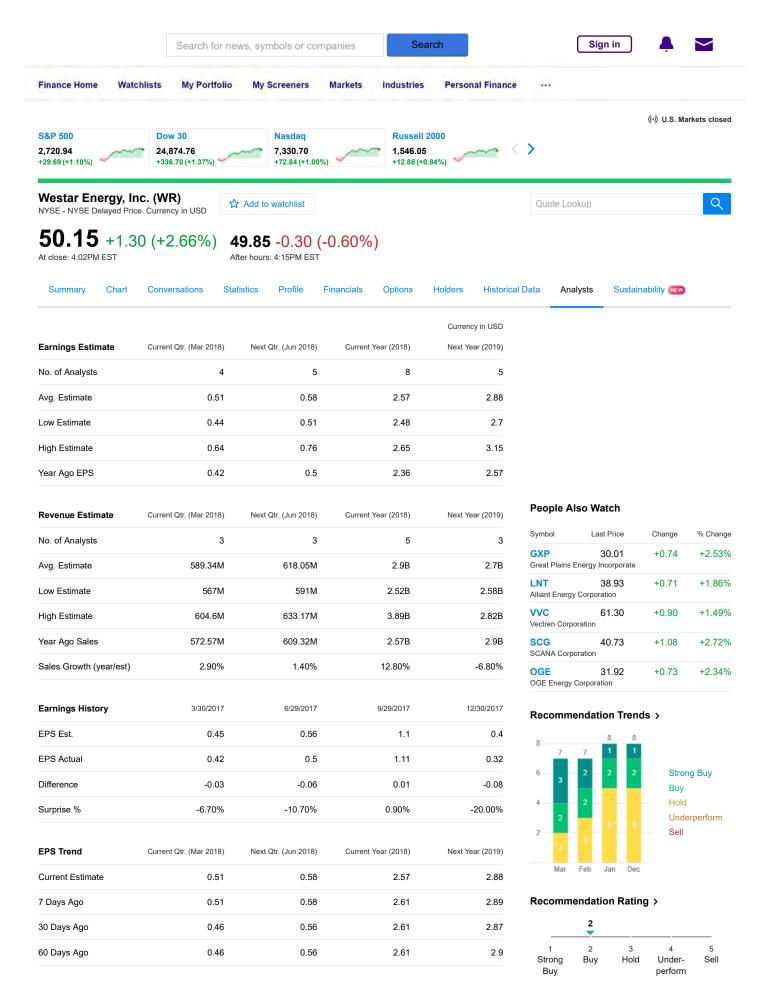


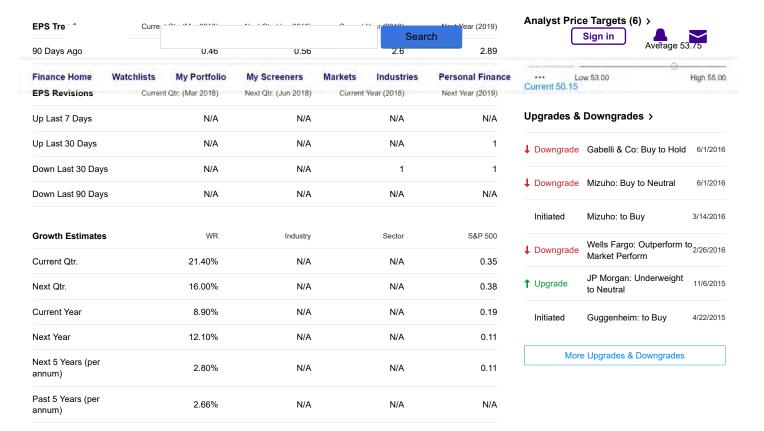
Analyst Price Targets (6) >

Average 53.75 Low 53.00 High 55.00 Current 49.72

Upgrades & Downgrades >



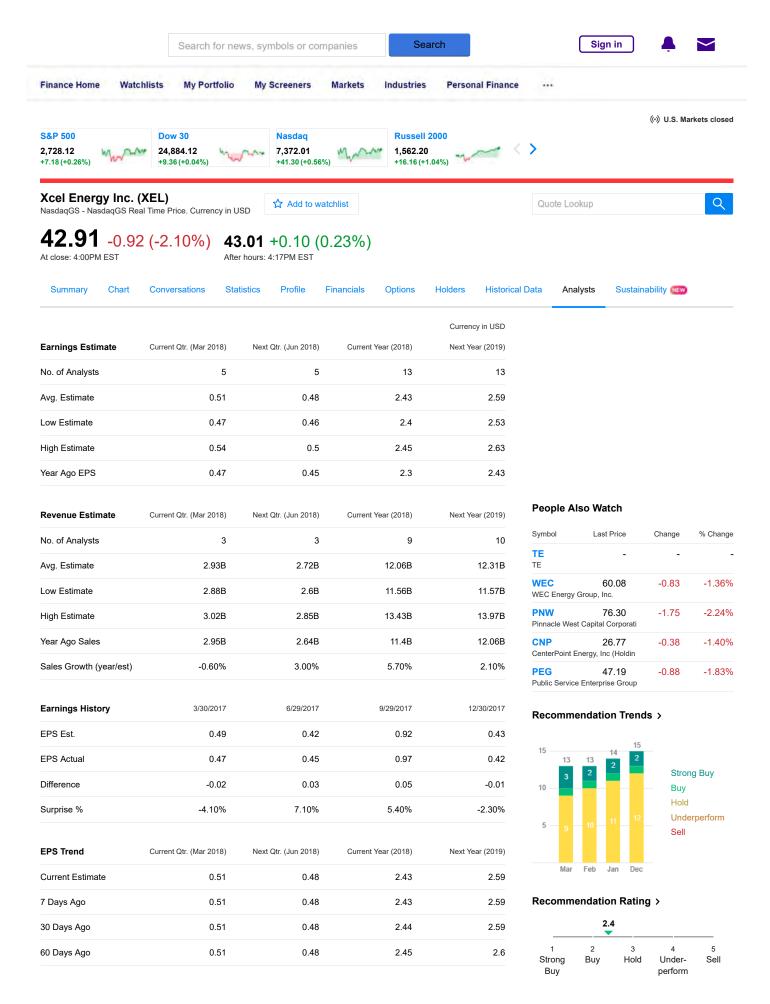




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EPS Tre	Curre	. 0. 41 0040	N 101 (1 0010)	Sea	Next Year (2019)	Analyst Pric	e Targets (12) >	<u>~</u>
90 Days Ago		0.5	0.47	2.45	2.6		Average 46.96	
Finance Home EPS Revisions	Watchlists Curren	My Portfolio t Qtr. (Mar 2018)	My Screeners Next Qtr. (Jun 2018)	Markets Industries Current Year (2018)	Personal Finance Next Year (2019)	Low¥2.00 Current	42.91	High 49.50
Up Last 7 Days		N/A	N/A	1	N/A	Upgrades &	Downgrades >	
Up Last 30 Days		1	1	1	N/A	† Upgrade	Morgan Stanley: Equal- Weight to Overweight	2/13/2018
Down Last 30 Days		N/A	N/A	N/A	N/A	Initiated	UBS: to Neutral	2/2/2018
Down Last 90 Days		N/A	N/A	N/A	N/A	Initiated	Mizuho: to Neutral	4/19/2017
Growth Estimates		XEL	Industry	Sector	S&P 500	↓ Downgrade	Barclays: to Equal-Weigh	+ 10/0/001e
Current Qtr.		8.50%	N/A	N/A	0.35	Downgrade	bardays. to Equal-weigh	12/2/2016
Next Qtr.		6.70%	N/A	N/A	0.38	↑ Upgrade	UBS: to Neutral	9/19/2016
Current Year		5.70%	N/A	N/A	0.19	↑ Upgrade	JP Morgan: to Overweigh	t 6/16/2016
Next Year		6.60%	N/A	N/A	0.11			
Next 5 Years (per annum)		6.15%	N/A	N/A	0.11	Mon	e Upgrades & Downgrades	
Past 5 Years (per annum)		6.48%	N/A	N/A	N/A			

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Security Start Date End Date Period	MOODUBAA Index	12/30/2016 0:00 3/12/2018 0:00
Data	DV I ACT	
Date	PX_LAST	4.53
2/0	/2018	4.55
	1/2018	4.52
	7/2018	4.54
	5/2018	4.53
	7/2018	4.48
	/2018	4.46
	/2018	4.41
	/2018	4.45
2/27	//2018	4.49
2/26	5/2018	4.46
2/23	/2018	4.46
2/22	/2018	4.5
2/21	/2018	4.51
2/20	/2018	4.45
2/16	5/2018	4.43
2/15	7/2018	4.43
2/14	-/2018	4.47
2/13	/2018	4.42
2/12	2/2018	4.41
	/2018	4.41
	2/2018	4.4
	7/2018	4.38
	5/2018	4.32
	7/2018	4.32
	/2018	4.35
	/2018	4.27
_	/2018	4.21
	0/2018	4.24
	0/2018	4.21
	5/2018	4.19
	7/2018 7/2018	4.16 4.22
	/2018	4.19
	/2018	4.19
	/2018	4.22
	1/2018	4.19
	7/2018	4.19
	5/2018	4.14
1/10	,2010	7.17

1/12/2018	4.16
1/11/2018	4.14
1/10/2018	4.21
1/9/2018	4.21
1/8/2018	4.15
1/5/2018	4.15
1/4/2018	4.13
1/3/2018	4.13
1/2/2018	4.16
12/29/2017	4.1
12/28/2017	4.11
12/27/2017	4.1
12/26/2017	4.17
12/22/2017	4.19
12/21/2017	4.19
12/20/2017	4.22
12/19/2017	4.18
12/18/2017 12/15/2017	4.11
12/13/2017	4.06
12/14/2017	4.08 4.1
12/13/2017	4.15
12/12/2017	4.13
12/8/2017	4.16
12/7/2017	4.16
12/6/2017	4.10
12/5/2017	4.11
12/4/2017	4.15
12/1/2017	4.15
11/30/2017	4.21
11/29/2017	4.2
11/28/2017	4.15
11/27/2017	4.15
11/24/2017	4.15
11/22/2017	4.13
11/21/2017	4.14
11/20/2017	4.18
11/17/2017	4.17
11/16/2017	4.18
11/15/2017	4.16
11/14/2017	4.2
11/13/2017	4.22
11/9/2017	4.15
11/8/2017	4.12
11/7/2017	4.11

11/6/2017	4.13
11/3/2017	4.15
11/2/2017	4.17
11/1/2017	4.2
10/31/2017	4.21
10/30/2017	4.22
10/27/2017	4.28
10/26/2017	4.3
10/25/2017	4.3
10/24/2017	4.28
10/23/2017	4.25
10/20/2017	4.26
10/19/2017	4.2
10/18/2017	4.22
10/17/2017	4.18
10/16/2017	4.2
10/13/2017	4.19
10/12/2017	4.24
10/11/2017	4.26
10/10/2017	4.27
10/9/2017	4.29
10/6/2017	4.3
10/5/2017	4.3
10/4/2017	4.3
10/3/2017	4.29
10/2/2017	4.28
9/29/2017	4.28
9/28/2017	4.3
9/27/2017	4.31
9/26/2017	4.22
9/25/2017	4.22
9/22/2017	4.25
9/21/2017	4.26
9/20/2017	4.28
9/19/2017	4.27
9/18/2017 9/15/2017	4.26
9/13/2017	4.23 4.24
9/14/2017	4.24
9/13/2017	4.26
9/12/2017	4.23
9/8/2017	4.15
9/7/2017	4.14
9/6/2017	4.14
9/5/2017	4.15
71512011	4.13

9/1/2017	4.23
8/31/2017	4.18
8/30/2017	4.21
8/29/2017	4.2
8/28/2017	4.2
8/25/2017	4.2
8/24/2017	4.22
8/23/2017	4.2
8/21/2017	4.21
8/18/2017	4.22
8/17/2017	4.22
8/16/2017	4.24
8/15/2017	4.27
8/14/2017	4.24
8/11/2017	4.22
8/10/2017	4.22
8/9/2017	4.25
8/8/2017	4.29
8/7/2017	4.27
8/4/2017	4.27
8/3/2017	4.24
8/2/2017	4.28
8/1/2017	4.29
7/31/2017	4.33
7/28/2017 7/27/2017	4.32
7/26/2017	4.36
7/25/2017	4.33 4.35
7/24/2017	4.29
7/24/2017	4.27
7/20/2017	4.3
7/19/2017	4.31
7/18/2017	4.32
7/17/2017	4.37
7/14/2017	4.4
7/13/2017	4.41
7/12/2017	4.4
7/11/2017	4.42
7/10/2017	4.43
7/7/2017	4.44
7/6/2017	4.41
7/5/2017	4.37
7/3/2017	4.38
6/30/2017	4.36
6/29/2017	4.34

6/28/2017	4.31
6/27/2017	4.28
6/26/2017	4.25
6/23/2017	4.26
6/22/2017	4.27
6/21/2017	4.27
6/20/2017	4.28
6/19/2017	4.32
6/16/2017	4.31
6/15/2017	4.29
6/14/2017	4.29
6/13/2017	4.37
6/12/2017	4.38
6/9/2017	4.37
6/8/2017	4.37
6/7/2017	4.36
6/6/2017	4.34
6/5/2017	4.37
6/2/2017	4.34
6/1/2017	4.4
5/31/2017	4.38
5/30/2017	4.4
5/26/2017	4.43
5/25/2017	4.44
5/24/2017	4.45
5/23/2017	4.46
5/22/2017	4.45
5/19/2017	4.44
5/18/2017	4.45
5/17/2017 5/16/2017	4.44
	4.53
5/15/2017 5/12/2017	4.54 4.54
5/11/2017	4.54
5/10/2017	4.58
5/9/2017	4.58
5/8/2017	4.56
5/5/2017	4.54
5/4/2017	4.55
5/3/2017	4.53
5/2/2017	4.53
5/1/2017	4.56
4/28/2017	4.51
4/27/2017	4.52
4/26/2017	4.53
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4/25/2017	4.55
4/24/2017	4.5
4/21/2017	4.47
4/20/2017	4.46
4/19/2017	4.44
4/18/2017	4.42
4/17/2017	4.49
4/13/2017	4.46
4/12/2017	4.51
4/11/2017	4.51
4/10/2017	4.56
4/7/2017	4.57
4/6/2017	4.55
4/5/2017	4.57
4/4/2017	4.56
4/3/2017	4.55
3/31/2017	4.58
3/30/2017	4.59
3/29/2017	4.55
3/28/2017	4.58
3/27/2017	4.54
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3/23/2017	4.58
3/22/2017	4.56
3/21/2017	4.59
3/20/2017	4.63
3/17/2017	4.65
3/16/2017	4.67
3/15/2017	4.64
3/14/2017	4.7
3/13/2017	4.71
3/10/2017	4.69
3/9/2017	4.7
3/8/2017	4.65
3/7/2017	4.61
3/6/2017	4.61
3/3/2017	4.6
3/2/2017	4.6
3/1/2017	4.59
2/28/2017	4.49
2/27/2017	4.51
2/24/2017	4.48
2/23/2017	4.55
2/22/2017	4.57
2/21/2017	4.57

2/17/2017	4.57
2/16/2017	4.59
2/15/2017	4.63
2/14/2017	4.61
2/13/2017	4.59
2/10/2017	4.56
2/9/2017	4.56
2/8/2017	4.52
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2/6/2017	4.6
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1/24/2017	4.64
1/23/2017	4.57
1/20/2017	4.64
1/19/2017	4.64
1/18/2017	4.6
1/17/2017	4.55
1/13/2017	4.6
1/12/2017	4.57
1/11/2017	4.57
1/10/2017	4.58
1/9/2017	4.59
1/6/2017	4.63
1/5/2017	4.6
1/4/2017	4.68
1/3/2017	4.7
12/30/2016	4.7

							ZAIII	DIT 9										
AVANGRID, INC.	NYSE	-AGR		R	ECENT Rice	45.8	3 P/E RAT	o 20 .	2 (Traili Medi	ng: 21.3) an: NMF)	RELATIVE P/E RATIO	1.0	5 DIV'D	3.8	3% V	/ALUI LINE	Ε	
TIMELINESS 3 Lowered 1/26/18									High:	38.9	46.7	53.5	50.9				Price	
SAFETY 2 Raised 2/17/17	LEGE	NDS							Low:	32.4	35.4	37.4	45.2			2021	2022	202
TECHNICAL 1 Raised 1/5/18	Options:	elative Price	e Strength															L80
BETA .35 (1.00 = Market)	Shaded	area indic	ates recess	ion														L_60
2021-23 PROJECTIONS											191.	111111111111111111111111111111111111111	•				+	+ 50
Ann'i Total											1111 ¹¹ 111	11.						+40
Price Gain Return High 50 (+10%) 6%																		30 25
Low 35 (-25%) -2%																		20
Insider Decisions											••. ••.							15
A M J J A S O N D to Buv 0 0 1 1 1 1 1 1 2											••••		•					<u> 10</u>
Options 0 0 0 0 0 0 0 1 0																		T _{7.5}
to Sell 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0																T. RETUR		T'.3
1Q2017 2Q2017 3Q2017	Percen	ıt 9 -														STOCK	/L ARITH.* INDEX	L
to Buy 121 119 104	shares	6 -										1.			1 yr. 3 yr.	30.3	17.3 38.0	F
to Sell 80 96 95 HId's(000) 43670 42981 44774	traded	3 -										Humbi			5 yr.	_	85.6	
AVANGRID, Inc. was forme	d thro	ough a	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	© VALI	UE LINE P	UB. LLC	21-23
merger between Iberdrola U										14.14	19.48	19.10	19.60	20.40	Revenue	es per sh		22.7
UIL Holdings Corporation in										3.44	4.74	4.90	5.20	5.50		low" per		6.50
2015. Iberdrola S.A., a worldv										1.05	1.98	2.15	2.30	2.45		s per sh		3.0
the energy industry, owns											1.73	1.73	1.76	1.80		cl'd per s		1.9
AVANGRID. The predecessor founded in 1852 and is head										3.50	5.52	7.10	6.45	5.85		ending p		5.7
New Gloucester, Maine. It was										48.74 308.86	48.90 308.99	49.30 309.00	49.90 309.00	50.55 309.00		lue per st n Shs Out		53.25 309.0
in 1997 in New York under th										33.5	20.5	21.2	Bold figu			'I P/E Rat		14.5
Resources, Inc. AVANGRID b										1.69	1.08	1.05	Value		0	P/E Ratio		.8
on the NYSE on December 17,											4.3%	3.8%	estim	ates		'l Div'd Y		4.5%
CAPITAL STRUCTURE as of 9/30/	17								4594.0	4367.0	6018.0	5900	6050	6300	Revenue	es (\$mill)		705
Total Debt \$5765 mill. Due in 5 Yo		9 mill.							424.0	267.0	611.0	660	720	765				89
LT Debt \$4767 mill. LT Interest	\$233 m	nill.							39.9%	11.3%	37.4%	30.5%	21.0%	21.0%	Income	. ,		21.0%
Incl. \$104 mill. capitalized leases. (LT interest earned: 4.5x)									6.8%	12.7%	7.5%	7.0%	7.0%	6.0%	AFUDC 9	% to Net F	Profit	6.0%
Leases, Uncapitalized Annual renta	als \$106	6 mill.							16.8%	23.1%	23.0%	24.0%	26.0%	25.0%	Long-Te	rm Debt F	Ratio	26.5%
									83.2%	76.9%	77.0%	76.0%	74.0%	75.0%		n Equity F		73.5%
Pension Assets-12/16 \$2672 mill.	hlia ¢a	448 mill.							14956	19583	19619	20075	20775	20775		pital (\$mi	II)	22300
Pfd Stock None	νiig ψυ	0							17099	20711	21548	22900	24000	24875			11	2710
A 04 COO COT CTO :									3.7% 3.4%	2.1% 1.8%	3.8% 4.0%	4.0% 4.5%	4.0% 4.5%	4.5% 5.0%		on Total Con On Shr. Eq	•	4.5% 5.5%
Common Stock 309,005,272 shs. as of 11/1/17									3.4%	1.8%	4.0%	4.5%	4.5%	5.0%		n Com E		5.5%
MARKET CAP: \$14 billion (Large	Cap)								3.4%	1.8%	1.4%	1.0%	1.0%	1.5%		to Com		2.0%
ELECTRIC OPERATING STATISTIC									0.470	1.070	66%	81%	76%	73%		s to Net F		67%
2014	2015	2016	BIIGINI	ECC. A1	/ANCDID	Inc. fo	rmorly I	hordrolo	IIQA Ja									
% Change Retail Sales (KWH) NA Avg. Indust. Use (MWH) NA	NA NA	NA NA				, Inc., fo									ating sou ciation ra			
Avg. Indust. Revs. per KWH (¢) NA	NA	NA	tric cus	tomers i	n New Y	ork, Coni	necticut,	and Mair	ne and 1	million	81.5%	of stock.	Has 6,8	300 emp	oloyees. (Chairman	n: José	Ignacio
Capacity at Peak (Mw) NA Peak Load, Summer (Mw) NA	NA NA	NA NA				York, (. Torger			
Annual Load Factor (%) NA	NA	NA				ted gener									oad, Orar			06477
% Change Customers (yr-end) NA	NA	+.5																
Fixed Charge Cov. (%) 347	183	415													g bus			
ANNUAL RATES Past Past		1'14-'16				se at									for a ney los			
of change (per sh) 10 Yrs. 5 Yrs Revenues		'21-'23 NMF	settle	emen	t for	ıt reg South	guiato ern (connec	prove ticut	Gas					iey ios have			

NMF NMF NMF ≺evenues 'Cash Flow' Earnings Dividends **Book Value**

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	1227	939	1048	1153	4367.0
2016	1670	1439	1418	1491	6018.0
2017	1758	1331	1341	1470	5900
2018	1800	1375	1375	1500	6050
2019	1875	1425	1425	1575	6300
Cal-	EA	RNINGS F	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	.42	.04	.22	.37	1.05
2016	.63	.33	.35	.67	1.98
2017	.77	.39	.32	.67	2.15
2018	.85	.40	.35	.70	2.30
2019	.90	.40	.40	.75	2.45
Cal-	QUAR	TERLY DIV	IDENDS P	AID B ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014					
2015					
2016		.432	.432	.432	1.30
2017	.432	.432	.432	.432	1.73
2018	.432				

calling for tariff hikes totaling \$11 million through the end of 2020. The order was based on a return of 9.25% on a commonequity ratio of 52%. Also, revenues and volume are now decoupled.

Rate relief should enable the company's earnings to increase in 2018 and **2019.** Southern Connecticut Gas isn't the only utility in the state that is benefiting from rate increases. United Illuminating's electric tariffs rose at the start of the new year, and will climb again at the start of 2019. AVANGRID's two utilities in New York will get rate hikes this year and next, on May 1st. But the company's regulated business is not the only source of profit growth. Its renewable-energy segment is adding wind and solar projects. What's more, this operation is approaching its goal of getting 75%-85% of its income from projects whose output is either contracted or hedged. This provides more stability than merchant (i.e., noncontracted) power. AVANGRID has decided to sell its gas-

losses in our earnings presentation. The company has announced the sale of the trading operation for \$64.5 million in cash. The sale is expected to close on March 1st. We expect a dividend increase this year. AVANGRID has stated its "commitment" to hike the disbursement in 2018. We look for a small boost because the payout ratio is high, even by utility standards. The balance sheet is solid. AVANGRID has the highest common-equity ratio of any company in this industry. Its Financial Strength rating is B++

This stock was one of the top performers among utility issues in 2017. The stock price soared 34%. We attribute this outperformance to takeover speculation. Like most utility equities, the quotation has retreated in 2018. The dividend yield is only about average for a utility, and with the recent price well within our 2021-2023 Target Price Range, total return potential is low.

Paul E. Debbas, CFA February 16, 2018

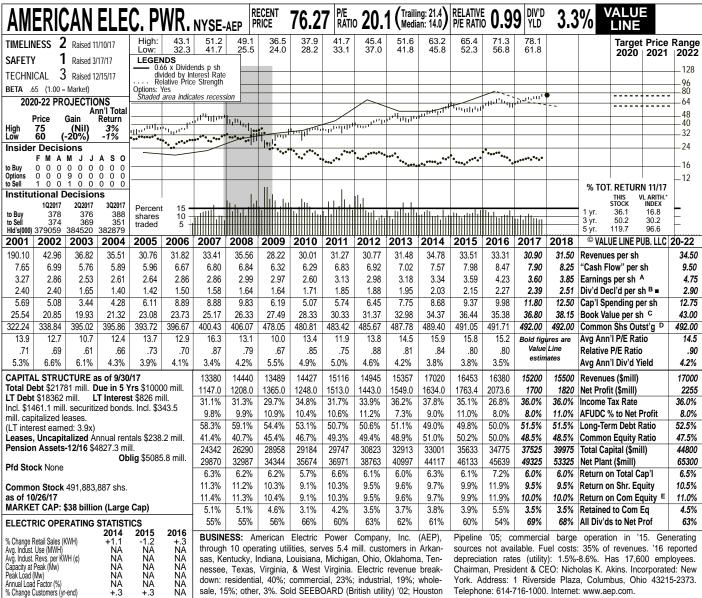
(A) Diluted EPS. Excl. nonrecurring gain: '16, intangibles. In '16: \$6.8 bill., \$21.86/sh. (D) In 66. Next earnings report due late Feb. (B) millions. (E) Rate base: net original cost. Rate Div'ds paid in early Jan., April, July, and Oct. allowed on com. eq. in NY in '16: 9.0%; in CT Dividend reinvestment plan available. (C) Incl. in '17: 9.1% elec.; in CT in '16: 9.36% gas; in

Company's Financial Strength Stock's Price Stability Price Growth Persistence **Earnings Predictability**

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90 NMF

NMF



374 348 356 Fixed Charge Cov. (% ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 2.5% 4.5% 5.0% 4.5% 4.5% Revenues .5% .5% 'Cash Flow" 2.5% 3.0% 3.0% 4.0% Earnings Dividends Book Value 5.0% 3.5%

Cal- endar	QUAR Mar.31		VENUES (Full Year
2014	4648	4044	4302	4026	17020
2015	4580	3827		3615	16453
2016	4045	3893		3790	16380
2017	3933	3577		3585	15200
2018	4000	3650	4200	3650	15500
Cal-	EA	RNINGS F	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	1.15	.80	1.01	.39	3.34
2015	1.27	.88	1.04	.41	3.59
2016	1.02	1.03	1.43	.76	4.23
2017	.94	.76	1.11	.79	3.60
2018	1.10	.80	1.20	.75	3.85
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.47	.49	.49	.50	1.95
2014	.50	.50	.50	.53	2.03
2015	.53	.53	.53	.56	2.15
2016	.56	.56	.56	.59	2.27
2017	.59	.59	.59	.62	

American Electric Power has some rate cases pending. Indiana & Michigan Power is seeking increases in Indiana and Michigan of \$263 million and \$52 million, respectively, based on a 10.6% return on equity. Kentucky Power filed for a hike of \$60 million, based on a 10.31% ROE. Public Service of Oklahoma requested a raise of \$157 million, based on a 10% ROE. In Texas, SWEPCO filed for a \$69 million net increase, based on a 10% ROE. New tariffs on this case will be retroactive to May of 2017. The other orders are due in 2018. This rate relief, along with additional revenues for AEP's transmission subsidiary, should help lift the company's earnings next year and in 2019. Our 2018 estimate is at the midpoint of management's guidance of \$3.75-\$3.95 a share. Profits should exceed the \$4.00-a-share mark in 2019.

The company is still trying to sell its remaining nonregulated generating assets. AEP wants to exit the merchant (noncontracted) generating business and become an almost entirely regulated company. To this end, it sold most of its nonregulated assets in the first quarter of 2017. (The lost income from these assets

will hurt share net by an estimated \$0.31 in 2017, however.) The company's remaining merchant assets have been written off, and will be shut if a buyer isn't found.

Hearings about a large wind project proposal are scheduled for the first quarter of 2018. The 2,000-megawatt project would cost \$4.5 billion and serve Öklahoma, Arkansas, Texas, and Louisi-ana. However, there has already been some opposition in Oklahoma. This would be AEP's largest renewable-energy project, but not its only one. The company's current presence is small, but its plans call for the addition of more than 8,300 mw of utility-owned and contracted renewable capacity by the end of 2030.

As we had expected, the board of directors raised the dividend in the fourth quarter. The quarterly disbursement was boosted by \$0.03 a share (5.1%). AEP's goal is a payout ratio of 60%-70%.

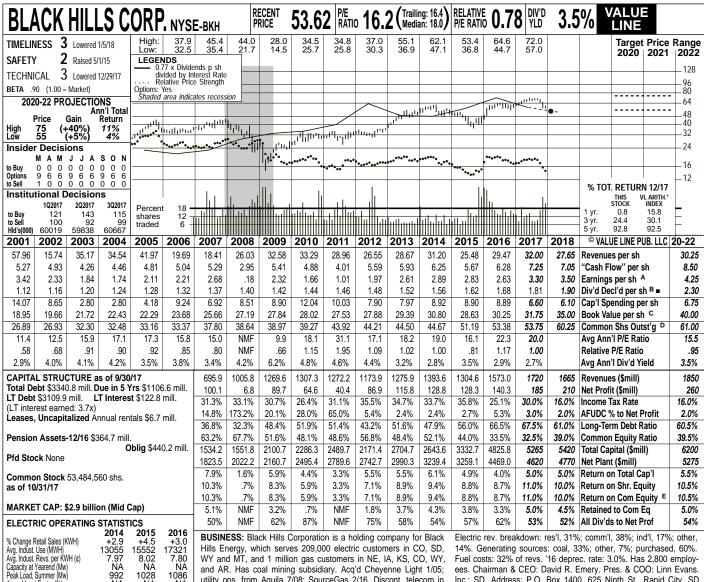
This timely stock has a dividend yield that equals the utility average. With the recent price above our 2020-2022 Target Price Range, however, total return potential is minimal.

Paul E. Debbas, CFA December 15, 2017

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(A) Dil. EPS. Excl. nonrec. gains (losses): '03, (32¢); '04, 15¢; '05, 7¢; '06, 2¢; '08, 3¢; '15, | ■ Div'd reinv. plan avail. (C) Incl. intang. In '16: (\$1.92); '04, 24¢; '05, (62¢); '06, (20¢), '07, (20¢), '08, 40¢; '10, (7¢); '11, 89¢; '12, (38¢); rounding. Next egs. report due late Jan. '13, (14¢); '16, (\$2.99); '17, 26¢; disc. ops.: '03, | (B) Div'ds paid early Mar., June, Sept., & Dec. | avg. com. eq., '16: 11.3%. Regul. Climate: Avg. © 2017 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part

Company's Financial Strength Stock's Price Stability A+ 95 Price Growth Persistence 50 **Earnings Predictability** 90



and AR. Has coal mining subsidiary. Acq'd Cheyenne Light 1/05; utility ops. from Aquila 7/08; SourceGas 2/16. Discont. telecom in '05; oil marketing in '06; gas marketing in '11; gas & oil E&P in '17. ees. Chairman & CEO: David R. Emery. Pres. & COO: Linn Evans. Inc.: SD. Address: P.O. Box 1400, 625 Ninth St., Rapid City, SD 57701. Tel.: 605-721-1700. Internet: www.blackhillscorp.com

Fixed Charge Cov. (%)		357	324	236
ANNUAL RATES	Past	Past	Est'd	'14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '	20-'22
Revenues	-1.0%	-2.0%	0	1.0%
"Cash Flow"	2.5%	5.0%		5.0%
Earnings	3.5%	11.0%		7.5%
Dividends	2.5%	2.5%		6.0%
Book Value	2.5%	1.5%	6	5.0%

OUADTEDLY DEVENUES (\$ mill)

Annual Load Factor (%)
% Change Customers (vr-end)

1028 NA +.9

1086 NA +.6

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	460.2	283.2	272.1	378.1	1393.6
2015	442.0	272.2	272.1	318.3	1304.6
2016	450.0	325.4	333.8	463.8	1573.0
2017	554.0	348.0	342.1	475.9	1720
2018	530	340	340	455	1665
Cal-	EA	RNINGS P	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	1.08	.44	.60	.76	2.89
2015	1.07	.55	.58	.63	2.83
2016	.94	.31	.41	.97	2.63
2017	1.39	.40	.50	1.01	3.30
2018	1.40	.40	.70	1.00	3.50
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.39	.39	.39	.39	1.56
2015	.405	.405	.405	.405	1.62
2016	.42	.42	.42	.42	1.68
2017	.445	.445	.445	.475	1.81
2018					

Black Hills is discontinuing its gas and oil exploration and production subsidiary. This operation was once profitable, but has become a drag on earnings due to low commodity prices. Black Hills has sold some assets for \$68 million, and has two more properties left to unload. Our figures still *include* the gas and oil business because Black Hills won't report this as a discontinued operation until it reports fourth-quarter earnings. We note that management's share-earnings guidance from continuing operations for 2017 and 2018 is \$3.30-\$3.40 and \$3.35-\$3.55, respectively.

Earnings are likely to improve this year. In 2017, earnings rose sharply due to the effects of the SourceGas acquisition in February of 2016. However, profits were hurt by unfavorable weather patterns. We assume normal weather in 2018. Note that share net this year will be diluted by the issuance of shares of conversion of equity units by November 1st.

Some gas rate applications are pending. In Arkansas, Black Hills is seeking a \$29.9 million gas tariff increase, based on a return of 10.2% on a common-equity

ratio of 54.7%. New rates are expected to take effect in the fourth quarter. Two gas filings totaling \$3.4 million are pending in Colorado and Wyoming. Black Hills hopes the Colorado case has a better outcome than the utility's previous filing in the state, when it received just \$1.2 million of the \$8.9 million it requested. The company is appealing this order to the district court.

The board of directors raised the dividend in the fourth quarter of 2017. This was one quarter earlier than the usual annual dividend review in the first period. The quarterly increase was \$0.03 a share (6.7%), to \$0.475 a share. We believe Black Hills will maintain this quarterly disbursement throughout 2018 and review the dividend again in early 2019. The targeted payout ratio is 50%-60%. This stock has a dividend yield that is

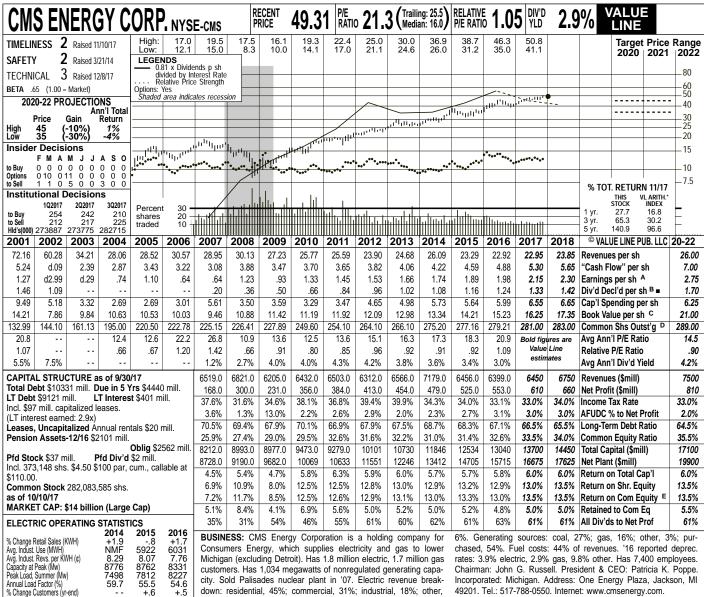
roughly equivalent to the utility average. The recent quotation is near the low end of our 2020-2022 Target Price Range. Total return potential over that time frame is unspectacular, but is better than that of most utilities

Paul E. Debbas, CFA January 26, 2018

(A) Dil. EPS. Excl. nonrec. gains (losses): '08, (\$1.55); '09, (28¢); '10, 10¢; '12, 4¢; '15, (\$3.54); '16, (\$1.26); gains (losses) on disc. ops.: '06, 21¢; '07, (4¢); '08, \$4.12; '09, 7¢; '11,

23¢; '12, (16¢). '14 EPS don't sum due to rounding. Next egs. due early Feb. (B) Div'ds paid early Mar., Jun., Sept., & Dec. ■ Div'd respectified; in CO in '17: 9.37%; earned on avg. inv. plan avail. (C) Incl. def'd chgs. In '16: com. eq., '16: 8.7%. Regulatory Climate: Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Company's Financial Strength Stock's Price Stability 80 Price Growth Persistence 70 **Earnings Predictability** 50



city. Sold Palisades nuclear plant in '07. Electric revenue breakdown: residential, 45%; commercial, 31%; industrial, 18%; other,

Incorporated: Michigan. Address: One Energy Plaza, Jackson, MI 49201. Tel.: 517-788-0550. Internet: www.cmsenergy.com

Fixed Charge Cov. (%)		278	288	292
ANNUAL RATES of change (per sh) Revenues "Cash Flow"	Past 10 Yrs. -2.0% 3.5%	Past 5 Yrs. -1.5% 5.0%	Est'd to '	'14-'16 20-'22 1.5% 7.5% 5.5%
Dividends Book Value	3.0%	11.5%	6	6.5% 6.5%
	ANNUAL RATES of change (per sh) Revenues "Cash Flow" Earnings Dividends	ANNUAL RATES of change (per sh) Revenues 'Cash Flow' Earnings Dividends 'For the state of the st	ANNUAL RATES of change (per sh) Past 10 Yrs. Past 5 Yrs. Revenues -2.0% -1.5% "Cash Flow" 3.5% 5.0% Earnings 8.5% 8.5% Dividends 11.5%	ANNUAL RATES Past of change (per sh) 10 Yrs. 5 Yrs. to* Revenues -2.0% -1.5% 7 "Cash Flow" 3.5% 5.0% 7 Earnings 8.5% 8.5% 6 Dividends 11.5% 6

+.6

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	2523	1468	1430	1758	7179.0
2015	2111	1350	1486	1509	6456.0
2016	1801	1371	1587	1640	6399.0
2017	1829	1449	1527	1645	6450
2018	1900	1550	1600	1700	6750
Cal-	EA	RNINGS P	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.75	.30	.34	.35	1.74
2015	.73	.25	.53	.38	1.89
2016	.59	.45	.67	.28	1.98
2017	.71	.33	.61	.50	2.15
2018	.80	.40	.65	.45	2.30
Cal-	QUAR1	ERLY DIV	IDENDS PA	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec. 31	Year
2013	.255	.255	.255	.255	1.02
2014	.27	.27	.27	.27	1.08
2015	.29	.29	.29	.29	1.16
2016	.31	.31	.31	.31	1.24
2017	.3325	.3325	.3325	.3325	

CMS Energy's utility subsidiary has filed a gas rate case. Consumers Energy is seeking an increase of \$178 million, based on a 10.5% return on equity. The primary driver of the application is the need to earn a return on investments the utility has made to replace old equipment. The utility is also seeking a regulatory mechanism that will allow concurrent recovery of certain kinds of capital costs and a mechanism to decouple gas volume and revenues. An order is due by the end of August.

An electric rate case is pending. Consumers Energy filed for an increase of \$173 million, based on a 10.5% ROE. The staff of the Michigan commission raised its recommendation, and is now at about \$70 million, based on a 9.8% ROE. The utility self-implemented a \$130 million increase on October 1st. The final ruling is due by the end of March.

We estimate steady earnings growth in 2017 and 2018. Rate relief and expense reductions are the key factors. Our 2017 estimate is at the low end of CMS Energy's targeted range of \$2.15-\$2.18 a share, and our 2018 forecast is within management's guidance of \$2.29-\$2.33 a share. CMS Energy's goal for annual profit growth is 6%-8%.

We expect a dividend increase at the board meeting in January. This has been the typical practice since CMS Energy restored the common dividend 10 years ago. We think the directors will raise the annual disbursement by \$0.09 a share (6.8%), the same as a year ago. Dividend hikes are likely to come at about the same pace as earnings increases.

The Michigan commission rejected

the proposed buyout of a purchasedpower contract with the owner of the Palisades nuclear plant. The commission allowed Consumers Energy recovery of just \$137 million of the \$172 buyout price. Thus, the companies agreed to cancel the deal. The above-market contract will continue through its expiration in May of 2022.

This stock is timely, but has a dividend yield that is low, by utility standards. With the recent price above our 2020-2022 Target Price Range, total return potential is negative.

Paul E. Debbas, CFA December 15, 2017

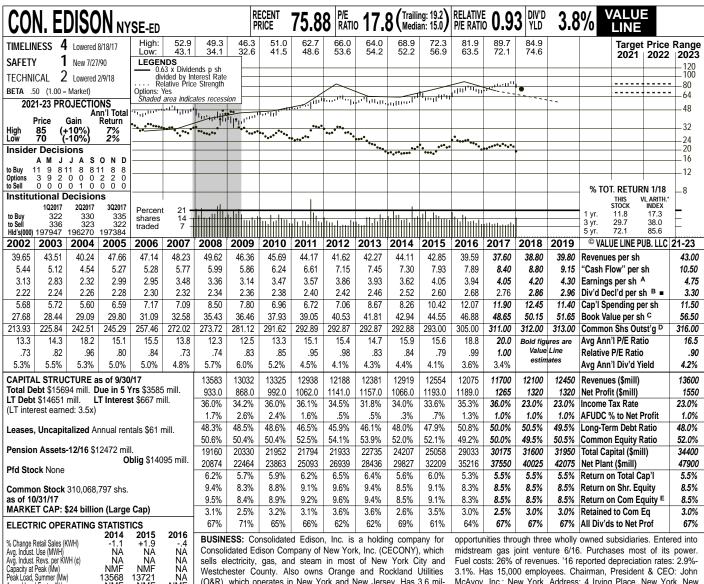
(A) Diluted EPS. Excl. nonrec. gains (losses): '05, (\$1.61); '06, (\$1.08); '07, (\$1.26); '09, (7¢); '10, 3¢; '11, 12¢; '12, (14¢); gains (losses) on disc. ops.: '05, 7¢; '06, 3¢; '07, (40¢); '09, 8¢;

10, (8¢); '11, 1¢; '12, 3¢. '16 EPS don't sum due to rounding. Next earnings report due early care base: Net orig. cost. Rate allowed on come eq. in '17: 10.19; earned on avg. come. Aug., & Nov. ■ Div'd reinvestment plan avail.

eq., '16: 13.5%. Regulatory Climate: Average

Company's Financial Strength Stock's Price Stability B++ 100 Price Growth Persistence **Earnings Predictability** 90

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Westchester County. Also owns Orange and Rockland Utilities (O&R), which operates in New York and New Jersey. Has 3.6 million electric, 1.2 million gas customers. Pursues competitive energy

3.1%. Has 15,000 employees. Chairman, President & CEO: John McAvoy. Inc.: New York. Address: 4 Irving Place, New York, New York 10003. Tel.: 212-460-4600. Internet: www.conedison.com.

370 352 366 Fixed Charge Cov. (%) ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 Revenues -.5% -1.5% .5% 'Cash Flow" 4.5% 3.5% 4.5% 4.5% 3.0% Earnings 2.0% 3.5% Dividends Book Value

% Change Customers (vr-end)

13568

NMF

NA

13721

NA

NA NMF

NA

Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year			
2015	3616	2788	3443	2707	12554			
2016	3157	2794	3417	2707	12075			
2017	3228	2633	3211	2628	11700			
2018	3300	2750	3300	2750	12100			
2019	3400	2825	3400	2825	12450			
Cal-	EA	RNINGS F	ER SHAR	A	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year			
2015	1.26	.74	1.45	.60	4.05			
2016	1.05	.77	1.47	.64	3.94			
2017	1.27	.57	1.48	.73	4.05			
2018	1.30	.63	1.60	.67	4.20			
2019	1.30	.65	1.65	.70	4.30			
Cal-	QUAR'	TERLY DIV	IDENDS PA	AID B ■	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year			
2014	.63	.63	.63	.63	2.52			
2015	.65	.65	.65	.65	2.60			
2016	.67	.67	.67	.67	2.68			
2017	.69	.69	.69	.69	2.76			
2018	.715							

Consolidated estimate that Edison's earnings will advance modestly in 2018 and 2019. The company's primary utility subsidiary, Consolidated Edison Company of New York, will benefit from rate increases each year. Electric and gas hikes of \$155.3 million (2.0%) and \$92.3 million (5.6%), respectively, took effect at the start of 2018. Electric and gas increases of \$155.2 million (1.9%) and \$89.4 million (5.1%) will go into effect at the start of 2019. In addition, the company's utilities continue to see customer conversions from oil heat to gas heat. And ConEd's clean energy (solar and wind) businesses are boosting their income by adding projects. Finally, ConEd has a 12.5% stake in a gas pipeline that is scheduled for an in-service date in late 2018. This represents a \$400 million investment for the company.

The board of directors raised the dividend in the first quarter of 2018. This is the usual timing of the annual increase. The board boosted the yearly disbursement by \$0.10 a share (3.6%). This was the largest increase in a long time and continued a pattern of accelerating dividend growth in recent years. ConEd's goal is a payout ratio in a range of 60%-70%

Finances are strong. The fixed-charge coverage and common-equity ratios are solid. The latter figure was augmented by the sale of 4.1 million common shares last August. Earned returns on equity are not exceptionally high, but have been relatively consistent in recent years as the utilities have earned (or have come close to earning) their allowed returns on equity. The company merits a Financial Strength rating of A+, our second highest.

The installation of smart meters is under way. The \$1.4 billion investment is scheduled for completion by 2022, with the peak spending set to occur two years from now. All told, 5.4 million smart meters will be installed in New York City and Westchester.

This top-quality stock is ranked unfavorably for Timeliness. The dividend yield is about average for a utility. Like most utility equities, the recent quotation is within our 2021-2023 Target Price Range. Accordingly, total return potential is unspectacular.

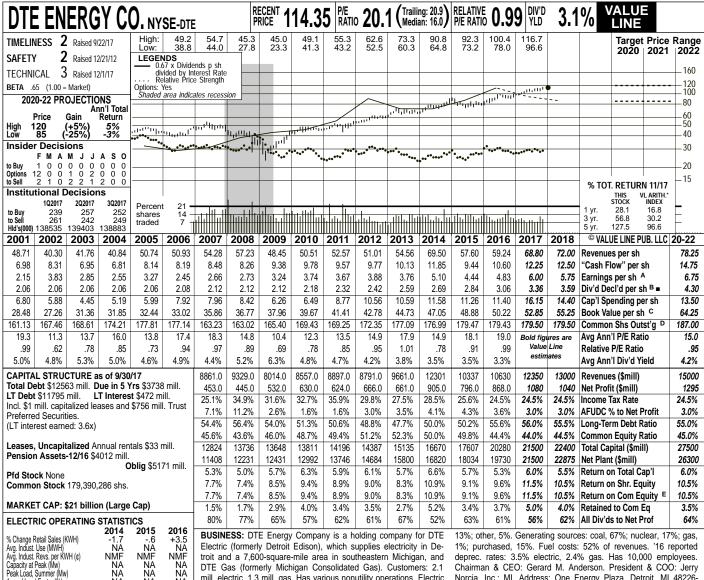
Paul E. Debbas, CFA February 16, 2018

(A) Diluted EPS. Excl. nonrec. gains (losses): '02, (11¢); '03, (45¢); '13, (32¢); '14, 9¢; '16, 15¢; gain on discontinued operations: '08, \$1.01. '16 EPS don't sum due to rounding.

Next earnings report due early May. **(B)** Div'ds historically paid in mid-Mar., June, Sept., and Dec. **•** Div'd reinvestment plan avail. **(C)** Incl. in '16: \$25.29/sh. **(D)** In mill. **(E)** Rate lowed on com. eq. for CECONY in '17: 9.0%; O&R in '15: 9.0%; earned on avg. com. eq., '16: 8.6%. Regulatory intang. In '16: \$25.29/sh. **(D)** In mill. **(E)** Rate

Company's Financial Strength Stock's Price Stability A+ 95 Price Growth Persistence 40 **Earnings Predictability** 95

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mill. electric, 1.3 mill. gas. Has various nonutility operations. Electric revenue breakdown: residential, 48%; commercial, 34%; industrial,

Norcia. Inc.: MI. Address: One Energy Plaza, Detroit, MI 48226-1279. Tel.: 313-235-4000. Internet: www.dteenergy.com

357 279 300 Fixed Charge Cov. (% **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 4.0% 2.0% 6.0% 5.5% 4.0% Revenues 2.5% 4.0% 5.5% 6.0% 7.0% 4.5% 'Cash Flow' 3.5% 5.5% Earnings Dividends Book Value 4 0%

% Change Customers (vr-end)

NA NA

NA NA

NA NA

QUARTERLY REVENUES (\$ mill.) Full endar Mar.31 Jun.30 Sep.30 Dec.31 2014 3930 2698 2595 12301 3078 2015 2984 2268 2598 2487 2016 2566 2262 2928 2874 10630 2017 3236 2855 3245 3014 12350 2018 3400 3000 3450 3150 13000 EARNINGS PER SHARE A Cal Full Mar.31 Jun.30 Sep.30 Dec.31 endar Year 2014 5.10 1.84 .70.88 1.68 2015 1.53 1.47 .61 .83 4.44 4.83 2016 1.37 .84 1.88 .7399 6.00 2017 2 23 1.51 1.27 1.90 1.00 5.75 2018 1.65 1.20 QUARTERLY DIVIDENDS PAID B = Cal-Mar.31 Jun.30 Sep.30 Year endar Dec.31 2014 655 .655 .655 2.66 2015 .69 .69 .69 .73 2.08 2016 .73 .73 .73.77 2.96 2017 .825 .825 .825 .825 2018 .8825

DTE Energy's gas utility has filed a general rate case. DTE Gas requested a tariff increase of \$85 million, based on a 10.5% return on equity. Among other things, the utility wants to accelerate its gas main-replacement program from 25 years to 15 years. A ruling is due by late September.

DTE Electric has a rate case pending, as well. The utility filed for a hike of \$25 million, based on a 10.5% ROE. It selfimplemented a \$125 million increase at the start of November. The staff of the Michigan Public Service Commission (MPSČ) recommended a boost of \$71 million, based on a 9.8% ROE. The MPSC's order is due in April.

Another regulatory matter is in front of the MPSC. DTE Electric is seeking a certificate of need to build a 1,100megawatt gas-fired plant at a cost of nearly \$1 billion. This would begin commercial operation in 2022, and would replace capacity from old coal-fired plants that would be retired. A decision is due by the end of April.

DTE Energy's board of directors has increased the dividend. The annual payout was raised by \$0.23 a share (7%), effective with the January payout. The company's goal is to provide 7% dividend growth each year through 2020.

Investors should not be alarmed by the earnings decline we estimate for 2018. The comparison (especially in the March quarter) is difficult because we include mark-to-market accounting gains or losses in our earnings presentation. These boosted the bottom line by \$0.39 a share in the first nine months of 2017. Aside from this, DTE Energy is benefiting from rate relief at its utilities and growth from its nonutility activities. It has begun construction of the NEXUS gas pipeline, which is scheduled for completion in the third quarter of 2018. The company's 50% stake will result in an investment estimated at \$1.25 billion.

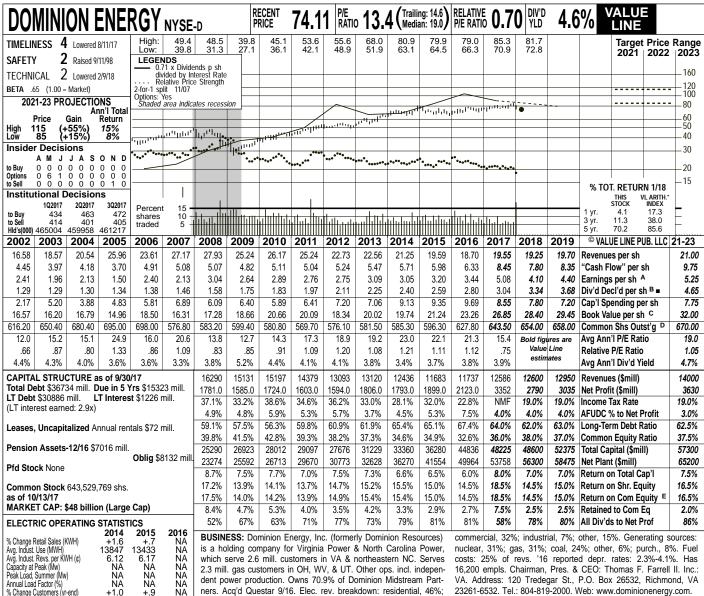
This stock is timely, but its dividend yield does not stand out among utilities. In addition, with the recent price near the upper end of our 2020-2022 Target Price Range, total return potential is minimal, despite DTE Energy's good earnings and dividend growth prospects. Paul E. Debbas, CFA December 15, 2017

(A) Diluted EPS. Excl. nonrec. gains (losses): '03, (16¢); '05, (2¢); '06, 1¢; '07, \$1.96; '08, 50¢; '11, 51¢; '15, (39¢); gains (losses) on disc. ops.: '03, 40¢; '04, (6¢); '05, (20¢); '06,

(2¢); '07, \$1.20; '08, 13¢; '12, (33¢). '16 EPS don't sum due to rounding. Next egs report due mid-Feb. (B) Div'ds paid in mid-Jan., Apr., July and Oct. ■ Div'd reinvest. plan avail. (C) Incl. intang. In '16: \$39.01/sh. (D) In mill. (E) Rate base: Net orig. cost. Rate allowed on com. eq. in '17: 10.1% elec.; in '16: 10.1% gas; earn. on avg. com. eq., '16: 4.9%. Reg. Clim.: Avg.

Company's Financial Strength Stock's Price Stability B++ 100 Price Growth Persistence **Earnings Predictability** 80

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2.3 mill. gas customers in OH, WV, & UT. Other ops. incl. independent power production. Owns 70.9% of Dominion Midstream Partners. Acq'd Questar 9/16. Elec. rev. breakdown: residential, 46%;

16,200 empls. Chairman, Pres. & CEO: Thomas F. Farrell II. Inc.: VA. Address: 120 Tredegar St., P.O. Box 26532, Richmond, VA 23261-6532. Tel.: 804-819-2000. Web: www.dominionenergy.com.

Fixed Charge Cov. (%)	 352	310
ANNUAL RATES of change (per sh) 10 Yr Revenues -1. "Cash Flow" 3. Earnings Dividends 7.	to '21 % 1. % 7.0 % 7.0 % 8.	

Annual Load Factor (%)
% Change Customers (vr-end)

NA

NA +.9

NA

NA +1.0

210/0 110/0 010/					3.070
Cal- endar			VENUES (Sep.30		Full Year
2015	3409	2747	2971	2556	11683
2016	2921	2598	3132	3086	11737
2017	3384	2813	3179	3210	12586
2018	3450	2850	3200	3100	12600
2019	3550	2900	3300	3200	12950
Cal-	EA	RNINGS P	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	.91	.70	1.00	.60	3.20
2016	.88	.73	1.10	.73	3.44
2017	1.01	.62	1.03	2.40	5.08
2018	1.05	.90	1.20	.95	4.10
2019	1.15	.95	1.30	1.00	4.40
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.60	.60	.60	.60	2.40
2015	.6475	.6475	.6475	.6475	2.59
2016	.70	.70	.70	.70	2.80
2017	.755	.755	.755	.77	3.04
2018	.835				

Dominion Energy has agreed to acquire SCANA. Dominion would pay \$7.1 billion in stock for the parent of South Carolina Electric & Gas, which has been troubled by the cancelation of its nuclear construction project due to extensive delays and cost overruns. Dominion is willing to forgo recovery of \$1.7 billion of the project's costs, but will walk away from the deal if the South Carolina commission and/or legislature insist on conditions that would reduce the value of the acquisition to the company. Dominion expects to complete the transaction by the third quarter, but the price of SCANA's stock is well below the value of Dominion's offer. This indicates the market's skepticism that the acquisition will be completed. Our estimates and projections exclude SCANA.

Tax reform is benefiting Dominion's **bottom line.** A credit for the revaluation of deferred taxes boosted share net by \$1.53 in the fourth quarter of 2017 (included in our earnings presentation). Dominion estimates that the lower federal tax rate will add \$0.10-\$0.15 a share to profits this year. Accordingly, we raised our 2018 earnings estimate by \$0.10 a

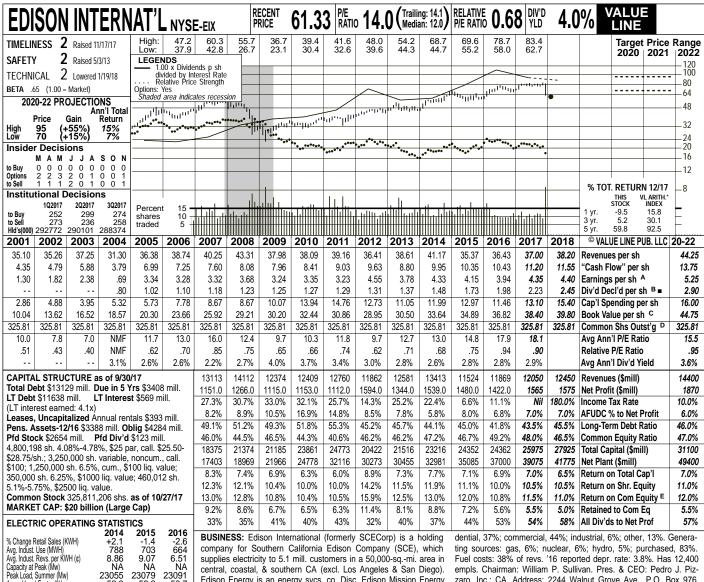
share, to \$4.10. This is within the company's targeted range of \$3.80-\$4.25 a share. Some large capital projects are coming on line. The Cove Point liquefied natural gas facility should come on line in early March (a few months behind schedule). Virginia Power is building a 1,588megawatt gas-fired plant that is scheduled for an in-service date in December at a cost of \$1.3 billion. These projects should add to Dominion's earning power. We forecast profit growth in 2019 in line with management's annual goal of 6%-8%.

The board of directors raised the dividend for the second-straight quarter. The latest increase was \$0.065 a share, which would make this year's payment 10% above last year's. Dominion's goal is 10% annual growth through 2020. The high payout ratio is manageable thanks to the distributions the company gets from its stake in Dominion Midstream Partners. This stock is untimely, but has appeal for income-oriented investors. The dividend yield is about a percentage point above the utility average, and total return potential to 2021-2023 is respectable. Paul E. Debbas, CFA February 16, 2018

(A) Dil. egs. Excl. nonrec. gains (losses): '04, (22¢); '06, (18¢); '07, \$1.67; '08, 12¢; '09, (47¢); '10, \$2.18; '11, (7¢); '12, (\$1.70); '14, (76¢); '17, (15¢); losses from disc. ops.: '06,

26¢; '07, 1¢; '10, 26¢; '12, 4¢; '13, 16¢. '15, '17 avail. (C) Incl. intang. In '16: \$15.12/sh. (D) In EPS don't sum due to rounding or chg. in shs. Next egs. due late Apr. (B) Div'ds paid in midadi, adj. for split. (E) Rate base: Net orig. cost, Next egs. due late Apr. (B) Div'ds paid in midadi. Mar., June, Sept., & Dec. ■ Div'd reinv. plan on avg. com. eq., '16: 15.8%. Reg. Clim.: Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Company's Financial Strength Stock's Price Stability B++ 100 Price Growth Persistence **Earnings Predictability** 80



supplies electricity to 5.1 mill. customers in a 50,000-sq.-mi. area in central, coastal, & southern CA (excl. Los Angeles & San Diego). Edison Energy is an energy svcs. co. Disc. Edison Mission Energy (independent power producer) in '12. Elec. rev. breakdown: resiFuel costs: 38% of revs. '16 reported depr. rate: 3.8%. Has 12,400 empls. Chairman: William P. Sullivan. Pres. & CEO: Pedro J. Pizzaro. Inc.: CA. Address: 2244 Walnut Grove Ave., P.O. Box 976, Rosemead, CA 91770. Tel.: 626-302-2222. Web: www.edison.com.

306 247 246 Fixed Charge Cov. (% ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 10 Yrs. 5 Yrs. to '20-'22 -.5% 4.0% 5.0% Revenues .5% 2.5% Cash Flow" 5.5% 5.5% 5.0% 4.0% Earnings 6.5% 9.0%

% Change Customers (vr-end)

23055 52.3

+.6

23091

50.7

+.5

23079

52.2

+.6

BOOK V	Book value		% Z.	5% 4	4.0%
Cal- endar	QUAR Mar.31	TERLY RE Jun.30	VENUES (Sep.30		Full Year
2014	2926	3016	4356	3115	13413
2015	2512	2908	3763	2341	11524
2016	2440	2777	3767	2885	11869
2017	2463	2965	3672	2950	12050
2018	2500	3000	3950	3000	12450
Cal-	EARNINGS PER SHARE A				Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.61	1.07	1.51	1.15	4.33
2015	.91	1.15	1.15	.94	4.15
2016	.85	.86	1.27	.96	3.94
2017	1.11	.85	1.44	.95	4.35
2018	1.10	.90	1.40	1.00	4.40
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.355	.355	.355	.355	1.42
2015	.4175	.4175	.4175	.4175	1.67
2016	.48	.48	.48	.48	1.92
2017	.5425	.5425		.5425	2.17
2018	.605				

Edison International's stock price has plummeted in recent weeks due to investors' concerns about the possible wildfire liability of its utility subsidiary. The share price is down more than 25% from its 52-week high. The service area of Southern California Edison experienced wildfires in the fall of 2017. The cause of the fires has not yet been determined. However, under California's inverse condemnation law, a utility can be held liable if its power lines contributed to the wildfires, even if the utility followed acceptable inspection and safety rules. SCE has \$1 billion in liability insurance. Moreover, there is no guarantee that the utility will be able to pass through to customers any restoration and other costs stemming from the wildfires. Despite the uncertainty surrounding this matter.

The board of directors raised the dividend significantly at the December meeting. The annual increase was \$0.25 a share (11.5%). By contrast, about two weeks after the board's action, the directors of PG&E Corporation (the parent of Pacific Gas and Electric in northern California) suspended the dividends of its com-

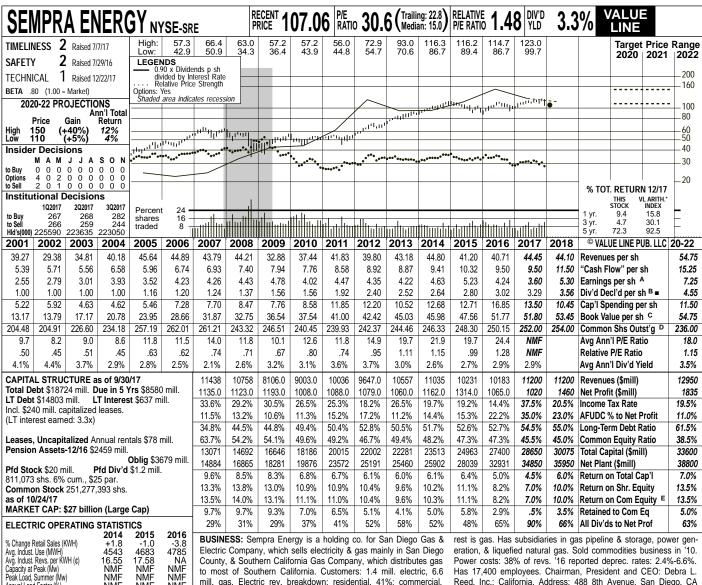
mon and preferred stocks due to similar wildfire worries. PG&E's move exacerbated the decline in Edison International's stock price. Even so, we think the company's dividend is not facing the risk of a cut. The utility is still awaiting an order on its general rate case. SCE is seeking rate hikes of \$10 million this year, \$477 million in 2019, and \$554 million in 2020. SCE forecasts capital spending of \$14.8 billion for the three-year request, including \$1.8 billion for modernization of the electric grid. This portion of the proposal has proved controversial. The CPUC's order will be retroactive to the start of 2018. This timely stock has a dividend yield that is a cut above the utility average. Investors with a 3- to 5-year horizon should receive a respectable total return. However, they must be willing to accept the uncertainty surrounding the wildfires. Another uncertainty concerns the possibility of additional refunds and/or customer credits stemming from the closing of the San Onofre nuclear plant. SCE's customers have already received refunds and credits totaling nearly \$1.6 billion. Paul E. Debbas, CFA January 26, 2018

(A) Diluted EPS. Excl. nonrec. gains (losses): '02, \$1.48; '03, (12¢); '04, \$2.12; '09, (64¢); '10, 54¢; '11, (\$3.33); '13, (\$1.12); '15, (\$1.18); gains (loss) from disc. ops.: '12, (\$5.11); '13,

11¢; '14, 57¢; '15, 11¢; '16, 3¢. '14 EPS don't add due to rounding. Next earnings report due (E) Rate base: net orig. cost. Rate allowed on late Feb. (B) Div'ds paid late Jan., Apr., July, & com. eq. in '15: 10.45%; earned on avg. com. Oct. Div'd reinvestment plan avail. (C) Incl. eq., '16: 11.0%. Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 50 **Earnings Predictability** 60

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to most of Southern California. Customers: 1.4 mill. electric, 6.6 mill. gas. Electric rev. breakdown: residential, 41%; commercial, 42%; industrial, 10%; other, 7%. Purchases most of its power; the

Has 17,400 employees. Chairman, President and CEO: Debra L. Reed, Inc.: California, Address: 488 8th Avenue, San Diego, CA 92101. Tel.: 619-696-2000. Internet: www.sempra.com.

Fixed Charge Cov. (%)		288	295	237
ANNUAL RATES of change (per sh) Revenues "Cash Flow" Earnings	Past 10 Yrs. 5% 4.0% 2.0%	Past 5 Yrs. 2.5% 4.0% 1.0%	Est'd	1 '14-'16 '20-'22 4.5% 8.0% 7.5%
Dividends Book Value	9.5% 7.0%	11.0% 5.0%		8.5% 2.0%

NMF

+.6

NMF

+.6

Annual Load Factor (%)
% Change Customers (vr-end)

Cal-			VENUES (Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	2795	2678	2815	2747	11035
2015	2682	2367	2481	2701	10231
2016	2622	2156	2535	2870	10183
2017	3031	2533	2679	2957	11200
2018	3050	2550	2650	2950	11200
Cal-	EA	RNINGS F	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.99	1.08	1.39	1.17	4.63
2015	1.74	1.03	.99	1.47	5.23
2016	1.61	.06	1.02	1.52	4.24
2017	1.75	1.20	.22	.43	3.60
2018	1.80	1.05	1.05	1.35	5.30
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.63	.66	.66	.66	2.61
2015	.66	.70	.70	.70	2.76
2016	.70	.755	.755	.755	2.97
2017	.755	.8225	.8225	.8225	3.22
2018	.8225				

Sempra Energy's proposed acquisition of Energy Future Holdings has made some progress. The company agreed to pay \$9.45 billion in cash for the 80%-owner of Oncor, a transmission and distribution electric company in Texas. To this end, Sempra has reached a settlement with the commission's staff and some intervenors recommending approval of the transaction. The company expects to complete the purchase in the first half of 2018. Sempra made some financing moves in connection with the deal. The company plans to finance it with 65% equity and 35% debt. It executed a forward sale of \$2.5 billion of common stock and issued \$1.5 billion of mandatorily redeemable preferred stock. (If the Energy Futures agreement falls through, the funds will be used for other purposes.) Sempra expects the transaction will be accretive to earnings (by an unspecified amount) this year, and will boost annual profits by an average of \$0.10-\$0.20 a share over a four-year period. We will not adjust our figures to reflect the acquisition until after it has been completed, however.

San Diego Gas & Electric received an

unfavorable ruling from the Califor-Utilities Commission Public (CPUC). The CPUC ruled that the utility may not pass the costs associated with 2007 wildfires through to customers. This forced the company to take an aftertax charge of \$208 million (\$0.82 a share) in the third quarter of 2017, which is included in our earnings presentation.

It appears as if the net effects of the changes in federal tax laws will be negative for Sempra. The company expects "a material noncash charge against earnings in the fourth quarter of 2017. This, and the aforementioned wildfire charge, induced us to slash our 2017 share-net estimate by \$1.35, to \$3.60.

Sempra's utilities have filed their general rate case. SDG&E and Southern California Gas are seeking increases for a three-year period, including a total of \$698 million effective at the start of 2019.

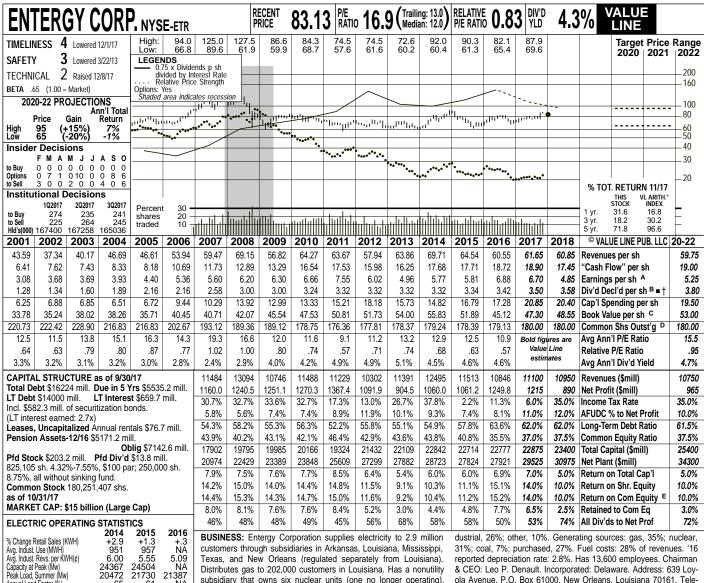
The stock is timely, but investors should be aware of the risks. Unless California law changes, utilities are at risk of absorbing significant costs every time there is a wildfire in their service area. Paul E. Debbas, CFA January 26, 2018

(A) Dil. EPS. Excl. nonrec. gains (losses): '05, 17¢; '06, (6¢); '09, (26¢); '10, (\$1.05); '11, \$1.15; '12, (98¢); '13, (30¢); '15, 14¢; '16, \$1.23; '17, (17¢); gain (loss) from disc. ops.:

'06, \$1.21; '07, (10¢). '14 & '16 EPS don't sum due to rounding or chg. in shs. Next egs. due late Feb. **(B)** Div'ds pd. mid-Jan., Apr., July, '13: 10.3%; SoCalGas in '13: 10.1%; earn. on Oct. ■ Div'd reinv. plan avail. (C) Incl. intang. In avg. com. eq., '16: 8.6%. Reg. Clim.: Avg.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 80 **Earnings Predictability** 75

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Distributes gas to 202,000 customers in Louisiana. Has a nonutility subsidiary that owns six nuclear units (one no longer operating). Electric revenue breakdown: residential, 37%; commercial, 27%; in-

& CEO: Leo P. Denault. Incorporated: Delaware. Address: 639 Loyola Avenue, P.O. Box 61000, New Orleans, Louisiana 70161. Telephone: 504-576-4000. Internet: www.entergy.com

Fixed Charge Cov. (%)		309	223	258
ANNUAL RATES	Past	Past	Est'd	'14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '	20-'22
Revenues	3.0%	1.0%	6 -	1.5%
"Cash Flow"	7.0%	2.5%		1.0%
Earnings	3.0%	-2.0%		2.5%
Dividends	5.0%	1.0%		2.0%
Book Value	3.0%	1.0%	D	.5%

+.6

+1.0

NA

Annual Load Factor (%)
% Change Customers (vr-end)

Cal- endar	QUAR Mar.31	TERLY RE Jun.30	VENUES (Sep.30	\$ mill.) Dec.31	Full Year
2014	3209	2997	3458	2831	12495
2015	2920	2713	3371	2509	11513
2016	2610	2463	3125	2648	10846
2017	2588	2619	3243	2650	11100
2018	2550	2600	3200	2600	10950
Cal-	EA	RNINGS F	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	2.27	1.09	1.68	.74	5.77
2015	1.65	.83	1.90	1.43	5.81
2016	1.28	3.16	2.16	.28	6.88
2017	.92	2.97	2.21	.60	6.70
2018	1.00	1.10	1.75	1.00	4.85
Cal-	QUART	ERLY DIVI	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.83	.83	.83	.83	3.32
2014	.83	.83	.83	.83	3.32
2015	.83	.83	.83	.85	3.34
2016	.85	.85	.85	.87	3.42
2017	.87	.87	.87	.89	

Entergy's transformation to an almost entirely regulated company will take a year longer than initially expected. In recent years, unfavorable conditions in the power markets, rising costs, and operating problems have hurt the profitability of the company's nonregulated nuclear units. So, Entergy closed one plant, sold another, and will shut its remaining units over the next five years. The company had expected to close the Palisades plant in Michigan at the end of 2018, but will continue with the power-sale contract that runs through May of 2022. The utility purchasing the power had agreed to buy out the contract, but the Michigan regulators did not approve the full buyout price.

The company is focusing on its regulated utility operations. Entergy Louisiana is building a 980-megawatt plant scheduled for completion in 2019 at a cost of \$869 million and a 994-mw facility for 2020 at a cost of \$872 million. Entergy Texas will construct a 993-mw plant for 2021 at a cost of \$937 million. Smaller units are being proposed for the New Orleans and Louisiana jurisdictions. Entergy also wants to spend about \$900 million to install advanced meters. This plan was approved by the regulators in Louisiana, Mississippi, and Arkansas, and awaits rulings in Texas and New Orleans.

Entergy's utilities benefit from load growth and formula rate plans. While many utilities are seeing little or no growth in demand, Entergy's service area has a healthy industrial sector. The company also has formula rate plans in Louisiana, Mississippi, and Arkansas, which provide for annual rate relief.

Tax credits have skewed Entergy's profits in recent years. In 2017, the tax rate will be unusually low for the third-consecutive year. We assume no such credit in 2018, which is why we forecast a significant earnings decline next year.

The board of directors raised the dividend in the fourth quarter. The increase was two cents a share (2.3%).

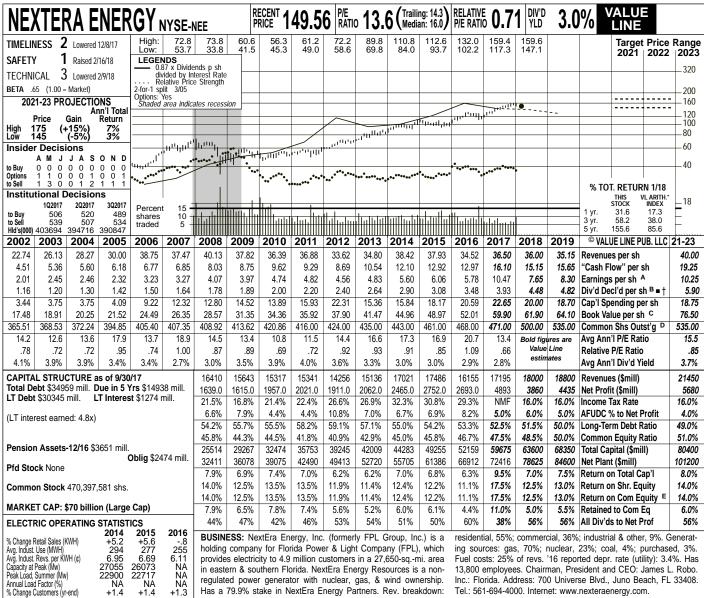
This untimely stock has a dividend yield that is about a percentage point above the utility average. However, with the recent price above the midpoint of our 2020-2022 Target Price Range, total return potential is unimpressive. Paul E. Debbas, CFA December 15, 2017

due to rounding. Next earnings report due early Feb. (B) Div'ds historically paid in early Mar., June, Sept., & Dec. • Div'd reinvest, plan avail.

due to rounding. Next earnings report due early february charges. In '16: \$34.32/sh. (D) In mill. (E) Rate base: Net orig. cost. Allowed ROE (blended): 9.95%; earned on avg. com. eq., '16: 12.8%.

Company's Financial Strength Stock's Price Stability B++ 95 Price Growth Persistence 10 **Earnings Predictability** 60

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regulated power generator with nuclear, gas, & wind ownership. Has a 79.9% stake in NextEra Energy Partners. Rev. breakdown:

Inc.: Florida. Address: 700 Universe Blvd., Juno Beach, FL 33408. Tel.: 561-694-4000. Internet: www.nexteraenergy.com

	316	348	339
Past	Past		1 '14-'16
10 Yrs.	5 Yrs.	to	'21-'23
1.5%	-	-	1.0%
7.5%	6.5%		6.0%
8.0%	5.0%	, D	8.5%
8.5%	9.0%	, D	9.5%
8.0%			6.5%
	10 Yrs. 1.5% 7.5% 8.0% 8.5%	Past 5 Yrs. 1.5% - 7.5% 6.5% 8.0% 5.0% 8.5% 9.0%	Past Past Est'c 10 Yrs. 5 Yrs. to 1.5% 7.5% 6.5% 8.0% 5.0% 8.5% 9.0%

ŇĀ

NA

+1.4

Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year
2015	4104	4358	4954	4070	17486
2016	3835	3817	4805	3698	16155
2017	3972	4404	4808	4011	17195
2018	4200	4600	5000	4200	18000
2019	4400	4800	5200	4400	18800
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	1.45	1.59	1.93	1.10	6.06
2016	1.41	.93	1.62	1.82	5.78
2017	1.91	1.68	1.79	5.09	10.47
2018	1.80	1.85	2.25	1.75	7.65
2019	2.15	2.20	2.25	1.70	8.30
Cal-	QUART	ERLY DIVI	DENDS PA	IDB ≡ †	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.725	.725	.725	.725	2.90
2015	.77	.77	.77	.77	3.08
2016	.87	.87	.87	.87	3.48
2017	.9825	.9825	.9825	.9825	3.93
2018					

The new federal tax law is a boon for **NextEra Energy.** The revaluation of deferred taxes boosted share earnings by almost \$4.00 in the fourth quarter of 2017. In addition, the lower tax rate will add \$0.45 a share to earnings in 2018. On the utility side, Florida Power & Light will use its tax reduction to compensate for the \$1.3 billion it spent for service restoration after extensive hurricane damage last year. FPL might also forgo rate relief it would have sought for 2021 and 2022.

We have raised our 2018 earnings estimate by \$0.60 a share. This is due mainly to the aforementioned tax benefit, but also to the company's strong performance. FPL received a \$211 million rate hike at the start of the year. The utility's customer growth is above average, at more than 1% annually. NextEra Energy Resources is growing through the acquisition of wind and solar projects, but this subsidiary is more than just a renewable-energy unit. Two natural gas pipelines began commercial operation last year, and another is scheduled for completion in 2018. Our 2018 share-profit estimate is within the company's targeted range of \$7.45-\$7.95 a

share. (Note: NextEra's "adjusted" earnings, which exclude some items we include, was \$6.70 a share in 2017.) We have raised the company's Financial Strength rating from A to A+ and the stock's Safety rank from 2 to 1 (Highest).

We forecast strong profit growth in 2019. FPL is building a 1,750-megawatt gas-fired plant that is scheduled for completion in mid-2019 at a cost of \$1.2 billion. When the facility achieves commercial operation, FPL will get another rate increase. Our 2019 share-net estimate is within NextEra's guidance of \$8.00-\$8.50. We expect a sizable dividend increase at the upcoming board meeting. We estimate a raise of \$0.55 a share (14%) in the annual payout, which is at the top end of NextEra's target of 12%-14% growth through 2018. With this declaration, Next-Era will state its goal for beyond 2018.

This timely stock was one of the top performers among utility issues in **2017.** The share price soared 31% last year. However, neither the yield nor the 3to 5-year total return potential stands out among utilities.

Paul E. Debbas, CFA

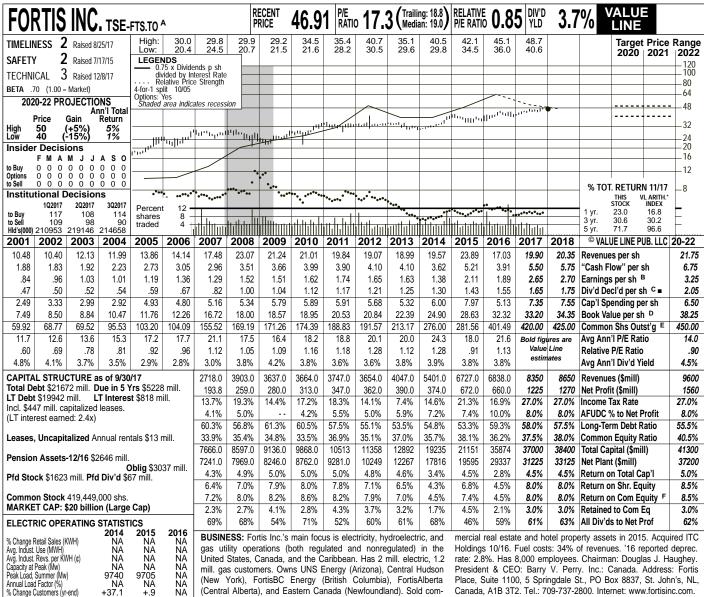
February 16, 2018

(A) Diluted EPS. Excl. nonrecur. gains (losses): '02, (60¢); '03, 5¢; '11, (24¢); '13, (80¢); '16, 47¢; '17, 91¢; gain on discont. ops.: '13, 44¢. '15 EPS don't sum due to rounding. Next earnings report due late Apr. (B) Div'ds historically paid in mid-Mar., mid-June, mid-Sept., & mid-Dec. ■ Div'd reinvestment plan avail. † Share-

charges. In '16: \$6.56/sh. (D) In mill., adj. for stock split. (E) Rate allowed on com. eq. in '17: holder investment plan avail. (C) Incl. deferred 11.5%. Regulatory Climate: Average

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 70 **Earnings Predictability** 60

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(New York), FortisBC Energy (British Columbia), FortisAlberta (Central Alberta), and Eastern Canada (Newfoundland). Sold comPlace, Suite 1100, 5 Springdale St., PO Box 8837, St. John's, NL, Canada, A1B 3T2. Tel.: 709-737-2800. Internet: www.fortisinc.com.

Fixed Charge Cov. (%)		141	195 173
ANNUAL RATES	Past	Past	Est'd '14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '20-'22
Revenues	4.0%	5%	1.5%
"Cash Flow"	5.0%	2.0%	
Earnings	4.0%	2.0%	
Dividends	9.0%	5.0%	
Book Value	9.5%	8.0%	5.0%

+37.1

Cal-	QUAR	QUARTERLY REVENUES (\$ mill.)				
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	
2014	1455	1056	1197	1693	5401	
2015	1915	1538	1566	1708	6727	
2016	1772	1485	1528	2053	6838	
2017	2274	2015	1901	2160	8350	
2018	2350	2050	2050	2200	8650	
Cal-	EA	RNINGS F	ER SHAR	В	Full	
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	
2014	.66	.22	.06	.44	1.38	
2015	.71	.43	.50	.48	2.11	
2016	.57	.38	.45	.49	1.89	
2017	.72	.62	.66	.65	2.65	
2018	.75	.65	.65	.65	2.70	
Cal-	QUAR	TERLY DIV	IDENDS P	AID c ■	Full	
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	
2013	.31	.31	.31	.31	1.24	
2014	.32	.32	.32	.32	1.28	
2015	.34	.34	.34	.375	1.40	
2016	.375	.375	.375	.40	1.53	
2017	.40	.40	.40	.425		

Fortis' earnings will almost certainly increase significantly in 2017. In 2016, the company recorded \$0.29 a share of costs associated with the acquisition of ITC Holdings, which was completed in October. The addition of ITC is proving to be accretive to share net. Also, Tucson Electric Power was granted an \$81.5 million rate hike by the Arizona commission in the first quarter of 2017. And in the third period, Fortis booked a breakup fee that boosted profits by \$0.06 a share after another company exercised its right of first offer for an asset Fortis tried to purchase. Without this breakup fee, earnings growth is likely to be much smaller in 2018.

There is a potential upside to our estimates. For several quarters before the acquisition by Fortis, ITC took reserves for possible refunds of previously collected revenues. This arose after the Federal Energy Regulatory Commission (FERC) cut the allowed return on equity for ITC and other owners of electric transmission in the region. A ruling from FERC will likely come in 2018. If the reduction in the allowed ROE is less than what ITC reserved for, a portion of the reserve will be reversed. We would include this income in our earnings presentation.

A large transmission project is not included in the company's capital forecast. The Lake Erie Connector has received necessary regulatory approvals, but Fortis must now strike enough deals with transmission users for the project to go ahead. This would result in an investment estimated at US\$1 billion.

Central Hudson Gas & Electric has a rate case pending. The utility is seeking electric and gas hikes of US\$43 million and US\$18 million, respectively, based on a return of 9.5% on a common-equity ratio of 50%. These are higher than the currently allowed 9.0% and 48%. New tariffs should take effect in mid-2018.

The board of directors raised the divi**dend.** The increase was \$0.10 a share (6.25%) annually. Fortis has established a goal of 6% yearly dividend growth through 2022

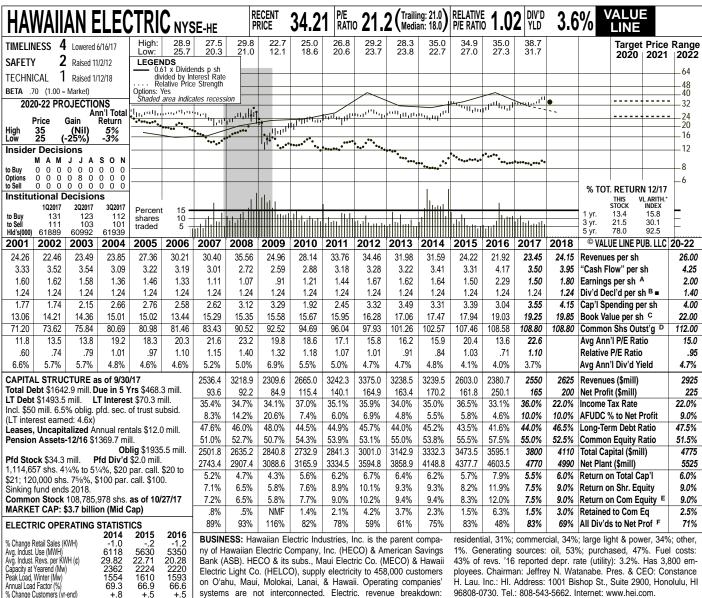
This timely stock has a dividend yield that is slightly above the industry mean. Like most utilities, 3- to 5-year total return potential is unspectacular. Paul E. Debbas, CFA December 15, 2017

(A) Also trades on NYSE under the symbol FTS. All data in Canadian dollars. (B) Dil. earnings. Excl. nonrec. gains: '06, 1¢; '07, 3¢; '14, 2¢; '15, 48¢. '15 EPS don't sum due to round-

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ing. Next earnings report due mid-Feb. (C) (E) In mill., adj. for split. (F) Rate base: varies. Div'ds historically paid in early Mar., June, Rates all'd on com. eq.: 8.3%-10.32%; earned sept., and Dec. ■ Div'd reinvest. plan avail. (2% disc.). (D) Incl. intang. In '16: \$39.84/sh. FERC, Above Avg.; AZ, Avg.; NY, Below Avg. © 2017 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part

Company's Financial Strength Stock's Price Stability R+ 100 Price Growth Persistence **Earnings Predictability** 70



on O'ahu, Maui, Molokai, Lanai, & Hawaii. Operating companies' systems are not interconnected. Electric. revenue breakdown:

Hawaiian Electric Industries' largest

utility subsidiary received a disap-

pointing interim rate order. Hawaiian Electric Company (HECO) had filed for a rate increase of \$106.4 million (6.9%),

based on a 10.6% return on a 57% common-equity ratio. The Public Utilities

Commission of Hawaii (PUC) granted

HECO a hike of \$38.4 million (2.3%),

based on a 9.5% return on the same common-equity ratio. Notably, the PUC disallowed some pension costs. This will

force the company to take an estimated \$17 million aftertax charge (\$0.16 a share)

against results for the December quarter, unless HECO's request for reconsideration is fruitful. A decision by the PUC was

expected shortly after this report went to press. We have included this charge in our fourth-quarter and full-year earnings esti-

mates. Note that the annual year-to-year

comparison was going to be unfavorable anyway because a \$90 million pretax pay-

ment from NextEra Energy (due to the lat-

ter company's unsuccessful takeover at-

H. Lau. Inc.: Hl. Address: 1001 Bishop St., Suite 2900, Honolulu, Hl 96808-0730. Tel.: 808-543-5662. Internet: www.hei.com

an increase of \$30.1 million (9.3%), based

on a 10.6% return on a 56.9% commonequity ratio. An interim decision is expect-

ed in September. Note that the aforementioned \$17 million charge includes \$1 mil-

HEI's utility business is not earning

an adequate ROE. For the 12-month period ending September 30th, the three

utilities (as a group) earned an ROE of just 7.2%. We think the utilities will con-

ary is performing well. Credit quality has improved, and (unlike the utility operations) ASB's ROE is rising. For the 12-

month period ending September 30th, the ROE improved to 11.2%, compared with 9.8% a year earlier. The lower tax rate will

benefit ASB, too. This will help boost

tinue to fall short of their allowed ROEs. The American Savings Bank subsidi-

lion for MECO.

Fixed Charge Cov. (%)		410	399	437
ANNUAL RATE		Past		'14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '	20-'22
Revenues	5%	-2.0%	0	Nil
"Cash Flow"	1.5%	4.5%	5 2	2.5%
Earnings Dividends	2.5%	9.0%	, 0	1.5%
		-		2.0%
Book Value	2.5%	3.0%	6	3.5%

+.5

Cal- endar	QUAR Mar.31		VENUES (Full Year
2014	783.7	798.7	867.1	790.0	3239.5
2015	637.9	623.9	717.2	624.0	2603.0
2016	551.0	566.2	646.1	617.4	2380.7
2017	591.6	632.3	673.2	652.9	2550
2018	625	650	700	650	2625
Cal-	EA	RNINGS P	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.45	.41	.46	.32	1.64
2015	.31	.33	.47	.39	1.50
2016	.30	.41	1.17	.41	2.29
2017	.31	.36	.55	.28	1.50
2018	.35	.43	.57	.45	1.80
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.31	.31	.31	.31	1.24
2015	.31	.31	.31	.31	1.24
2016	.31	.31	.31	.31	1.24
2017	.31	.31	.31	.31	1.24
2018					

(A) Dil. EPS. Excl. gains (losses) from disc. ops.: '01, (36¢); '03, (5¢); '04, 2¢; '05, (1¢); nonrec. gain (losses): '05, 11¢; '07, (9¢); '12, (25¢). Next earnings report due mid-Feb.

Maui Electric Company (MECO) has a rate case pending. The utility filed for (B) Div'ds historically paid in early Mar., June, Sept., & Dec. ■ Div'd reinvest. plan avail. (C) Incl. intang. In '16: \$9.57/sh. (D) In mill.,

tempt) inflated profits in 2016.

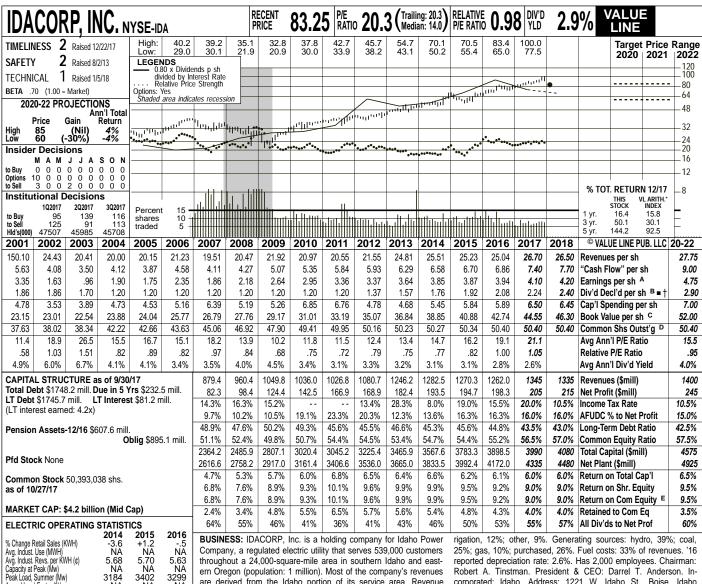
lowed on com. eq. in '11: HECO, 10%; in '12: HELCO, 10%; in '13: MECO, 9%; earn. on avg. com. eq., '16: 12.4%. Regulat. Climate: Below adj. for split. (E) Rate base: Orig. cost. Rate al- Avg. (F) Excl. div'ds paid through reinv. plan.

Company's Financial Strength Stock's Price Stability Price Growth Persistence **Earnings Predictability**

HEI's profits in 2018. Even so We advise investors to look elsewhere. The stock is ranked unfavorably for Timeliness, the dividend has not been raised for many years, and the recent price is near the upper end of our 2020-2022 Target Price Range.

Paul E. Debbas, CFA January 26, 2018

> A 95 20 65



are derived from the Idaho portion of its service area. Revenue breakdown: residential, 41%; commercial, 24%; industrial, 14%; ir-

corporated: Idaho. Address: 1221 W. Idaho St., Boise, Idaho 83702. Telephone: 208-388-2200. Internet: www.idacorpinc.com

Fixed Charge Cov. (%)		287	307	295
ANNUAL RATES of change (per sh) Revenues "Cash Flow" Earnings Dividends Book Value	Past 10 Yrs. 2.0% 5.0% 7.0% 5.0% 5.0%	Past 5 Yrs. 3.5% 4.5% 5.5% 10.0% 5.5%	to	1 '14-'16 '20-'22 1.5% 5.0% 3.5% 7.0% 4.0%

ŇĀ

NA +1.8

Annual Load Factor (%)
% Change Customers (vr-end)

Cal- endar	QUAR Mar.31	TERLY RE Jun.30	VENUES(Sep.30	mill.) Dec.31	Full Year
2014 2015 2016 2017	292.7 279.4 281.0 302.5	317.8 336.3 315.4 333.0	382.2 369.2 372.0 408.3	289.8 285.4 293.6 301.2	1282.5 1270.3 1262.0 1345
2018	310	330	390	305	1335
Cal-	EA	RNINGS P	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.55	.89	1.73	.69	3.85
2015	.47	1.31	1.46	.63	3.87
2016	.51	1.12	1.65	.66	3.94
2017	.66	.99	1.80	.65	4.10
2018	.63	1.02	1.85	.70	4.20
Cal-	QUART	ERLY DIVI	DENDS PA	IDB ■ †	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.43	.43	.43	.47	1.76
2015	.47	.47	.47	.51	1.92
2016	.51	.51	.51	.55	2.08
2017	.55	.55	.55	.59	2.24
2018					

We have trimmed our 2017 earnings estimate for IDACORP by \$0.05 share, to \$4.10. In the fourth quarter, the Idaho Public Utility Commission (IPUC) disallowed \$4.3 million of costs associated with Idaho Power's relicensing of the utility's largest hydroelectric complex. The §4.3 million is a pretax figure, which we estimate will amount to a nickel a share after taxes. Our revised estimate is at the midpoint of IDACORP's targeted range of \$4.05-\$4.15 a share.

We look for a modest profit increase this year. Idaho Power is benefiting from strong customer growth, which is a byproduct of the service area's solid economy. (The foodservice industry in Idaho is especially strong.) For the 12-month period that ended on September 30th, the customer count advanced 1.8%. Kilowatt-hour sales aren't rising as fast as this, but are still experiencing healthy growth. Effective cost control is another advantage. In recent years, the company has earned a return on equity between 9% and 10%, and we think this will occur again in 2018.

A regulatory mechanism is available dend growth over that time frame. to augment the utility's income, if Paul E. Debbas, CFA January

needed. This year and next, Idaho Power may use up to \$25 million a year of accumulated deferred investment tax credits if its earned ROE will fall below 9.5%. In all, \$45 million is available through the end of 2019. It is possible that the IPUC will extend this mechanism beyond 2019. Note that the ROEs shown in the statistical array are for IDACORP as a whole, not just its utility subsidiary.

Finances are in good shape. common-equity ratio is high for this industry. The fixed-charge coverage is solid. There are no significant debt maturities until 2020.

This timely equity is priced expensively. The dividend yield is low for a utility, and the price-earnings ratio is above that of the market. What's more, the recent quotation is near the upper end of our 2020-2022 Target Price Range. We believe this is due in part to takeover speculation. We do not advise purchasing this stock in the hope of a buyout. Finally, 3- to 5-year total return potential is negative, despite our expectation of 7% average annual divi-January 26, 2018

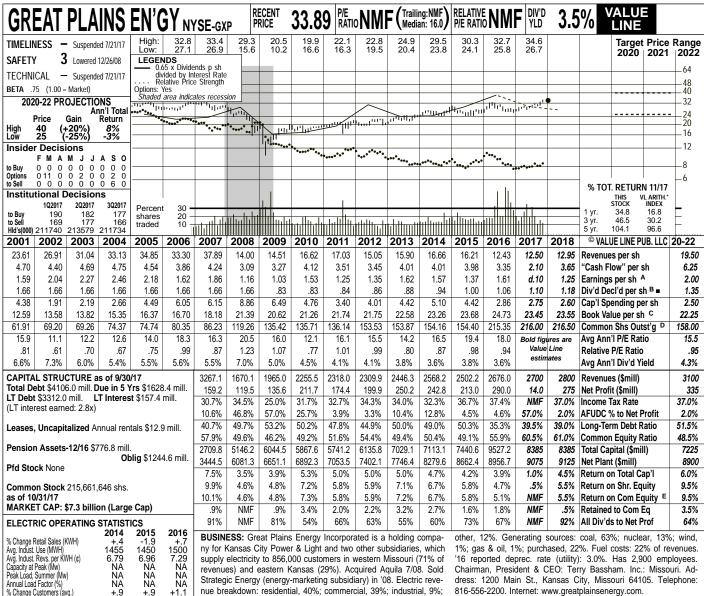
(A) Diluted EPS. Excl. nonrecurring gains (loss): '03, 26¢; '05, (24¢); '06, 17¢. '14 earnings don't add due to rounding. Next earnings report due late Feb. (B) Div'ds historically paid

'16: \$28.15/sh. (D) In millions. (E) Rate base: Above Average.

in late Feb., May, Aug., and Nov. ■ Div'd reinvestment plan available. † Shareholder investment plan available. (C) Incl. intangibles. In com. eq., '16: 9.4%. Regulatory Climate:

Company's Financial Strength Stock's Price Stability 95 Price Growth Persistence 85 **Earnings Predictability** 95

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Strategic Energy (energy-marketing subsidiary) in '08. Electric revenue breakdown: residential, 40%; commercial, 39%; industrial, 9%;

dress: 1200 Main St., Kansas City, Missouri 64105. Telephone: 816-556-2200. Internet: www.greatplainsenergy.com.

	261	254	307
Past	Past		'14-'16 20-'22
-7.5%	-1.0%	6	4.5%
-1.5% -3.0%			3.5% 4.5%
-5.0% 4.0%			5.0% 1.0%
	10 Yrs. -7.5% -1.5% -3.0% -5.0%	Past 10 Yrs. 5 Yrs7.5% -1.0% -3.0% 3.5% -5.0%	Past Past Est'd 5 Yrs. to' -7.5% -1.0% -1.5% 1.0% 8 -3.0% 3.5% 4 -1.0% 1.0% 1.5% 1.0% 1.5% 1.5% 1.5% 1.5% 1.5% 1.5% 1.5% 1.5

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	585.1	648.4	782.5	552.2	2568.2
2015	549.1	609.0	781.4	562.7	2502.2
2016	572.1	670.8	856.8	576.3	2676.0
2017	570.7	682.6	857.2	589.5	2700
2018	600	700	900	600	2800
Cal-	EA	RNINGS P	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.15	.34	.95	.12	1.57
2015	.12	.28	.82	.15	1.37
2016	.17	.20	.86	.39	1.61
2017	d.11	d.10	.02	.09	d.10
2018	.08	.20	.84	.13	1.25
Cal-	QUART	TERLY DIV	IDENDS PA	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.2175	.2175	.2175	.23	.88
2014	.23	.23	.23	.245	.94
2015	.245	.245	.245	.2625	1.00
2016	.2625	.2625	.2625	.275	1.06
2017	.275	.275	.275	.275	

The merger of Great Plains Energy and Westar Energy has been approved by each company's stockholders. The agreement calls for Great Plains holders to receive .5981 of a share of the new company, to be named prior to closing, for each Great Plains share in a tax-free exchange. The combination requires the approval of the Missouri and Kansas commissions, and the Federal Energy Regulatory Commission. The companies expect the deal to be completed in the first half of 2018.

We continue to advise stockholders to retain their shares. The companies' utilities are a good fit, with contiguous service areas and ample opportunities for mergerrelated cost reductions. The combined company's goals are 6%-8% annual earnings and dividend growth, with a targeted payout ratio of 60%-70%. The stock is unranked for Timeliness due to the pending transaction

Merger-related expenses will almost certainly result in a loss in 2017. Most notably, Great Plains incurred sizable costs when it unwound the financing moves it made in anticipation of its pre-

vious deal with Westar, which failed to receive regulatory approval due to the debt Great Plains took to finance the \$8.6 billion cash-and-stock proposal. Without these costs (and the shares Great Plains issued in 2016), profits would have amounted to \$1.61 a share in the first nine months of 2017. Our 2018 forecast, which is for Great Plains as a stand-alone company, includes an expectation of additional deal-related expenses in the first two quarters. Note, too, that we expect no dividend increase while the merger is pending. The company's utilities plan to file rate cases in early 2018. These will be unrelated to the pending merger. The regulatory process lasts 11 months in Missouri and eight months in Kansas, so any rate relief the utilities obtain won't have a significant effect on profits until 2019.

We would not make new commitments here. Like many utility stocks, Great Plains is priced expensively. In fact, the price has risen nearly 25% so far in 2017. The pending transaction is better for Great Plains holders than the previous one would have been, in our view.

Paul E. Debbas, CFA December 15, 2017

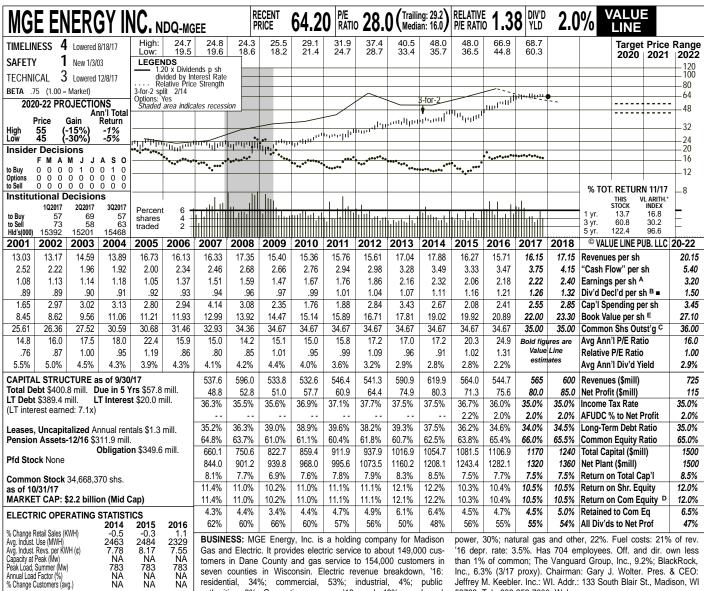
(A) Diluted earnings. Excl. nonrec. gains (losses): '01, (\$2.01); '02, (5¢); '03, 29¢; '04, (7¢); '09, 12¢; gain (losses) on disc. ops... '03, (13¢); '04, 10¢; '05, (3¢); '08, 35¢. '14 & '16

plan avail. (C) Incl. intang. In '16: \$5.65/sh.

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EPS don't sum due to rounding. Next egs. report due late Feb. **(B)** Div'ds historically paid in mid-Mar., June, Sept. & Dec. **•** Div'd reinvest. **(D)** In mill. **(E)** Rate base: Fair value. Rate allowed on com. eq. in MO in '17: 9.5%; in KS in '15: 9.3%; earned on avg. com. eq., '16: 6.7%. Regulatory Climate: MO, Below Avg.; KS, Avg. © 2017 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part

Company's Financial Strength Stock's Price Stability B+ 95 Price Growth Persistence 25 **Earnings Predictability** 75



residential, 34%; commercial, 53%; industrial, 4%; public authorities, 9%. Generating sources, '16: coal, 48%; purchased

Jeffrey M. Keebler. Inc.: WI. Addr.: 133 South Blair St., Madison, WI 53788. Tel.: 608-252-7000. Web: www.mgeenergy.com

645 Fixed Charge Cov. (%) 702 616 ANNUAL RATES Est'd '14-'16 Past Past of change (per sh) 10 Yrs. 5 Yrs. to '20-'22 1.5% 4.5% 6.0% 3.0% 3.5% 8.0% 6.5% Revenues 5.0% 6.0% 2.5% 'Cash Flow" Earnings **Book Value** 6.0% 5.5% 5.0%

	ALLAD	TEDLV DE	VENUEO /	h!!! \	
Cal-			VENUES (Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	210.3	128.8	135.1	145.7	619.9
2015	170.1	122.1	140.8	131.0	564.0
2016	147.5	121.6	136.7	138.9	544.7
2017	156.8	126.5	139.5	142.2	565
2018	165	135	148	152	600
Cal-	EA	RNINGS F	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.80	.41	.67	.44	2.32
2015	.53	.39	.82	.32	2.06
2016	.49	.47	.80	.42	2.18
2017	.56	.45	.77	.44	2.22
2018	.58	.50	.82	.50	2.40
Cal-	QUAR	TERLY DIV	IDENDS PA	AID B .	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.2634	.2634	.2717	.2717	1.07
2014	.2717	.2717	.2825	.2825	1.11
2015	.2825	.2825	.2950	.2950	1.16
2016	.2950	.2950	.3075	.3075	1.21
2017	.3075	.3075	.3225	.3225	
1					

Shares of MGE Energy have traded in a fairly narrow range lately. The company posted mixed results for the third quarter. The top line increased roughly 2%, year over year. Share net of \$0.77 came in shy of the prior-year figure. Performance was constrained during the period owing to lower customer demand due to weather during the summer months. Looking forward, we anticipate a more favorable bottom-line comparison for the fourth quarter. Slightly higher share earnings ought to accompany a moderate top-line advance for the company in fullvear 2017.

Investment in operations appear promising. Along with two other parties, MGE has agreed to acquire a stake in Forward Wind Energy Center. Assuming regulatory approval, the acquisition of this wind site would provide access to renewable energy for an additional 15 years. Meanwhile, the company plans to construct a wind farm near Saratoga, Iowa, pending regulatory approval. Assuming this occurs, the project is expected to become operational in 2018 at an estimated capital cost of \$107 million. The 66megawatt site would consist of 33 turbines. The expansion of MGE's solar program should also pay off.

Prospects for the coming years appear relatively favorable. The company's utility operations ought to capitalize on favorable demographics in their service territories. Expansion in the residential customer base will likely continue to benefit performance here. Efforts by the company to control operating expenses should also bear fruit. As a result, we envision solid growth in revenues and earnings at MGE Energy from 2018 onward.

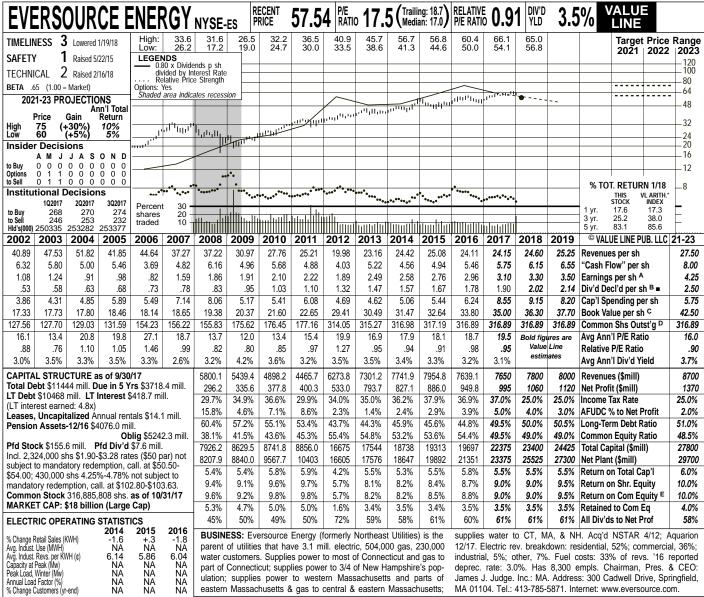
These shares lack appeal at this juncture. This stock is ranked to underperform the broader market averages for the coming six to 12 months. Looking further out, the equity does not offer appreciation potential for the pull to early next decade. The issue presently trades at a price-toearnings multiple that is significantly greater than its historical average. On top of that, the dividend yield is on the low side for a utility. All things considered, find subscribers can probably moreattractive choices elsewhere. Michael Napoli, CFA December 15, 2017

(A) Diluted earnings. Next earnings report due late February. (B) Dividends historically paid in mid-March, June, September, and December. In 2016: \$164.9 mill., \$4.76 per share. line, \$4.76 per share. line ■ Dvd. reinvestment plan available. (C) In mil-

Above Average. (E) Includes regulatory assets.

Company's Financial Strength Stock's Price Stability 85 Price Growth Persistence 70 **Earnings Predictability** 90

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ulation; supplies power to western Massachusetts and parts of eastern Massachusetts & gas to central & eastern Massachusetts;

James J. Judge. Inc.: MA. Address: 300 Cadwell Drive, Springfield, MA 01104. Tel.: 413-785-5871. Internet: www.eversource.com

Fixed Charge Cov. (%)		426	447	436
ANNUAL RATES	Past	Past	Est'd	'14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '2	1-'23
Revenues	-6.0%	-2.5%	5 1	.5%
"Cash Flow"	.5%	5%	7.	.0%
Earnings	12.0%	6.0%		.5%
Dividends	9.5%	10.5%		.0%
Book Value	6.0%	8.5%	6 4	.0%

Annual Load Factor (%)
% Change Customers (vr-end)

Cal-		\$ mill.)	Full		
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	2513	1817	1933	1691	7954.8
2016	2056	1767	2040	1776	7639.1
2017	2105	1763	1989	1793	7650
2018	2150	1800	2000	1850	7800
2019	2200	1850	2050	1900	8000
Cal-	EA	RNINGS P	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	.80	.65	.74	.57	2.76
2016	.77	.64	.83	.72	2.96
2017	.82	.72	.82	.74	3.10
2018	.90	.75	.90	.75	3.30
2019	.95	.80	.95	.80	3.50
Cal-	QUAR1	ERLY DIV	IDENDS PA	\ID B∎	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.3925	.3925	.3925	.3925	1.57
2015	.4175	.4175	.4175	.4175	1.67
2016	.445	.445	.445	.445	1.78
2017	.475	.475	.475	.475	1.90
2018	.505				

Eversource Energy completed the acquisition of Aquarion Water in early December. The company paid \$880 million in cash for the water utility, which serves nearly 230,000 customers in Connecticut (mostly), Massachusetts, and New Hampshire. Eversource also assumed \$795 million of debt and borrowed \$900 million to finance the purchase. The earnings from the addition of Aquarion Water should offset the lost income from the generating assets that Eversource's utility in New Hampshire has sold and is selling

We estimate profits will advance 6% this year and next. This is within the company's goal of 5%-7% yearly growth. Eversource's utility in Massachusetts received rate relief at the start of February. It was granted (before the pass-through of federal tax cuts to customers) \$37 million, based on a 10% return on equity. The utility will receive additional annual increases to compensate for the effects of inflation. Connecticut Light & Power reached a settlement that, if approved by the state regulators, will provide a tariff hike of \$97 million on May 1st, \$33 million a year later, and \$25 million a year after that,

based on a 9.25% ROE. Spending on electric transmission is also boosting the company's earning power. (There is some uncertainty about what the federally allowed ROE will be, but even in the worst case it will stay above the allowed ROEs for Eversource's distribution business.) On the gas side, the company is benefiting from the conversion of oil heating customers to gas. A proposed transmission project has had a setback. Eversource wants to build a line to connect New England and Quebec. However, the New Hampshire Site Evaluation Committee denied the project's

siting application. Eversource will seek reconsideration of this decision. It will have to write off some \$200 million of development costs if the project is canceled. The board of directors raised the divi**dend.** The quarterly payout was increased by \$0.03 a share (6.3%). Eversource's goal

is 5%-7% annual dividend growth, the same as for earnings. This high-quality stock has a dividend

yield and 3- to 5-year total return potential that are about average for a utility

Paul E. Debbas, CFA February 16, 2018

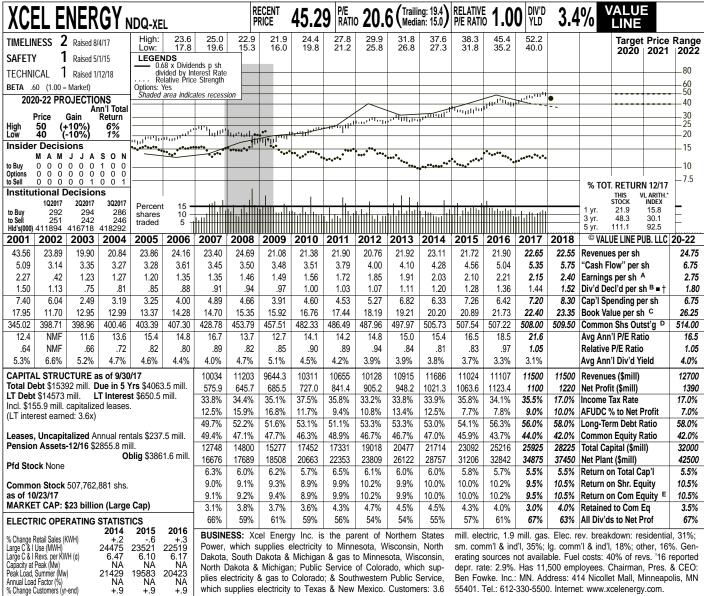
(A) Dil. EPS. Excl. nonrec. gains (losses): '02, 10¢; '03, (32¢); '04, (7¢); '05, (\$1.36); '08, (19¢); '10, 9¢. Next earnings report due late Feb. (B) Div'ds historically paid late Mar., June,

'18, 10.0%; (gas) '16, 9.8%; in CT: (elec.) '15, MA, Above Average.

Sept., & Dec. ■ Div'd reinvestment plan avail. (C) Incl. def'd charges. In '16: \$22.59 sh. (D) In mill. (E) Rate allowed on com. eq. in MA: (elec) Climate: CT, Below Average; NH, Average;

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 80 **Earnings Predictability** 85

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plies electricity & gas to Colorado; & Southwestern Public Service, which supplies electricity to Texas & New Mexico. Customers: 3.6

Ben Fowke. Inc.: MN. Address: 414 Nicollet Mall, Minneapolis, MN 55401. Tel.: 612-330-5500. Internet: www.xcelenergy.com.

344 358 342 Fixed Charge Cov. (% ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 10 Yrs. 5 Yrs. to '20-'22 Revenues -.5% .5% 2.0% 5.0% 6.0% 5.0% 4.5% 'Cash Flow" 3.0% 5.0% 6.5% 4.5% Earnings 6.0% 4.0%

% Change Customers (vr-end)

ΝA

+.9

DOOK Value		4.5	70 4.	370	4.0%
Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year
2014	3203	2685	2870	2928	11686
2015	2962	2515	2901	2646	11024
2016	2772	2500	3040	2795	11107
2017	2946	2645	3017	2892	11500
2018	2900	2650	3050	2900	11500
Cal-	EA	RNINGS F	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.52	.39	.73	.39	2.03
2015	.46	.39	.84	.41	2.10
2016	.47	.39	.90	.45	2.21
2017	.47	.45	.97	.26	2.15
2018	.55	.42	.98	.45	2.40
Cal-	QUART	ERLY DIVI	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.28	.30	.30	.30	1.18
2015	.30	.32	.32	.32	1.26
2016	.32	.34	.34	.34	1.34
2017	.34	.36	.36	.36	1.42
2018	.36				

As usual, Xcel Energy has a few rate **cases pending.** Public Service of Colorado has multiyear applications for electricity and gas. For electricity, the utility filed for a total of \$245 million from 2018 through 2020. For gas, the utility requested increases totaling \$139 million from 2018 through 2020. Each case is based on a 10% return on a 55.25% common-equity ratio. Orders are expected in March for gas and in June for electricity. Southwestern Public Service has electric cases pending in Texas and New Mexico. In Texas, the utility filed for \$54.6 million, and in New Mexico, it requested \$42.5 million. Each case is based on a return of 10.25% on a commonequity ratio of 54%. In Texas, new tariffs are expected to be retroactive to January of 2018, and in New Mexico, new rates are anticipated in the second half of 2018.

Multiyear rate cases and frequent filings are enabling Xcel's utilities to narrow the gap between their allowed and earned ROEs. Northern States Power has a multiyear rate plan in place in Minnesota, and was granted electric and gas increases of \$9.4 million and \$9.9 million, respectively, in Wisconsin. Xcel's

operating companies as a group are earning an ROE that is about a half percentage point below the allowed ROE, a smaller gap than in recent years. (Note: The new tax law will result in one-time taxes in 2017 of \$68 million-\$89 million for the revaluation of deferred taxes. This is included in our earnings presentation.)

Other regulatory matters are pending. The company is asking the Texas and New Mexico commissions to approve wind projects totaling 1,230 megawatts at a cost of \$1.6 billion. Rulings are expected in the current quarter. P.S. of Colorado is proposing a plan of up to \$1.5 billion of investment for renewable and gas-fired plants. A decision is expected this summer.

We expect a dividend hike this quarter. We estimate the board will raise the quarterly payout by \$0.02 a share (5.6%), the same increase as in recent years, but wouldn't rule out a larger boost. Xcel's goal is annual dividend growth of 5%-7%.

This timely stock's yield is about equal to the utility mean. With the recent price within our 2020-2022 Target Price Range, total return potential is low. Paul E. Debbas, CFA January 26, 2018

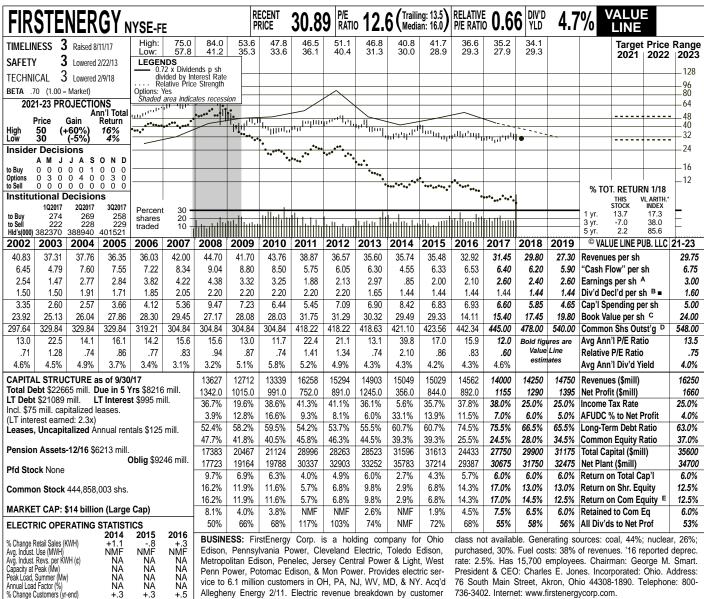
(A) Diluted EPS. Excl. nonrecurring gain (losses): '02, (\$6.27); '10, 5¢; '15, (16¢); gains (losses) on discontinued ops.: '03, 27¢; '04, (30¢); '05, 3¢; '06, 1¢; '09, (1¢); '10, 1¢. Next

earnings report due early Feb. **(B)** Div'ds historically paid mid-Jan., Apr., July, and Oct.

Div'd reinvestment plan available. † Shareholder investment plan available. (C) Incl. intangibles. In '16: \$6.07/sh. **(D)** In mill. **(E)** Rate base: Varies. Rate allowed on com. eq. (blended): 9.6%; earned on avg. com. eq., '16: 10.4%. Regulatory Climate: Average

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 100

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vice to 6.1 million customers in OH, PA, NJ, WV, MD, & NY. Acq'd Allegheny Energy 2/11. Electric revenue breakdown by customer

76 South Main Street, Akron, Ohio 44308-1890. Telephone: 800-736-3402. Internet: www.firstenergycorp.com

Fixed Charge Cov. (%)		118	206	208
ANNUAL RATES	Past	Past	to '7 6 -2 6 2 7 6 3	'14-'16
of change (per sh)	10 Yrs.	5 Yrs.		21-'23
Revenues	5%	-3.5%		2.0%
"Cash Flow"	-2.5%	-5.5%		2.0%
Earnings	-6.0%	-10.0%		2.0%
Dividends	-2.5%	-8.0%		1.5%
Book Value	-1.0%	-3.5%		Nil

NA +.3

Annual Load Factor (%)
% Change Customers (vr-end)

Cal-	QUAR		VENUES (\$ mill.)	Full
endar	Mar.31		Sep.30	Dec.31	Year
2015	3897	3468	4123	3541	15029
2016	3869	3401	3917	3375	14562
2017	3547	3309	3714	3430	14000
2018	3650	3450	3700	3450	14250
2019	3750	3550	3900	3550	14750
Cal-	EA	RNINGS F	ER SHARI	E A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015 2016 2017 2018 2019	.53 .77 .69 .70	.46 .34 .58 .50	.95 .89 .92 .85	.06 .10 .41 .35 .40	2.00 2.10 2.60 2.40 2.60
Cal-	QUAR	TERLY DIV	IDENDS P.	AID B ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014 2015 2016 2017 2018	.36 .36 .36 .36	.36 .36 .36 .36	.36 .36 .36 .36	.36 .36 .36 .36	1.44 1.44 1.44 1.44

FirstEnergy made some substantial financing moves. The company issued \$850 million of common stock and \$1.62 billion of preferred stock that is mandatorily convertible after 18 months. First-Energy is using the proceeds to retire debt and fund its pension plan. This will strengthen the company's balance sheet and lower its pension expense beginning this year. FirstEnergy affirmed its expectation to maintain the common dividend at the current level. Wall Street had a favorable reaction to the announcement, sending the stock price surging more than 10% on the day of the announcement.

FirstEnergy aims to become an entirely regulated company. It established a restructuring working group to make recommendations to management. Last year, FirstEnergy stated its hope to achieve this goal by mid-2018, but this now appears ambitious. The company strategy arose from the struggles of its nonregulated businesses in recent years, which have been hurt by unfavorable conditions in the power markets. In fact, FirstEnergy's main nonregulated subsidiary might not be able to retire the \$515 mil-

lion of debt that is due from April through yearend. (The parent company and utilities would not be part of a bankruptcy filing.) FirstEnergy has written down and sold some nonutility assets, and will likely sell or close additional facilities. The company had a setback when federal regulators rejected its proposal to transfer a nonregulated coal-fired plant to its utilities in West Virginia. In all, earnings are even

more unpredictable than usual.

The regulated operations are faring well. FirstEnergy's utilities in Pennsylvania and New Jersey received rate relief last year. The company's utilities in Ohio asked the state commission to approve a three-year, \$450 million electric system modernization plan. It is asking for a ruling by May. FirstEnergy plans to spend \$800 million-\$1.2 billion on transmission annually through 2021, and some 90% of this will be recovered through a forwardlooking federal regulatory mechanism.

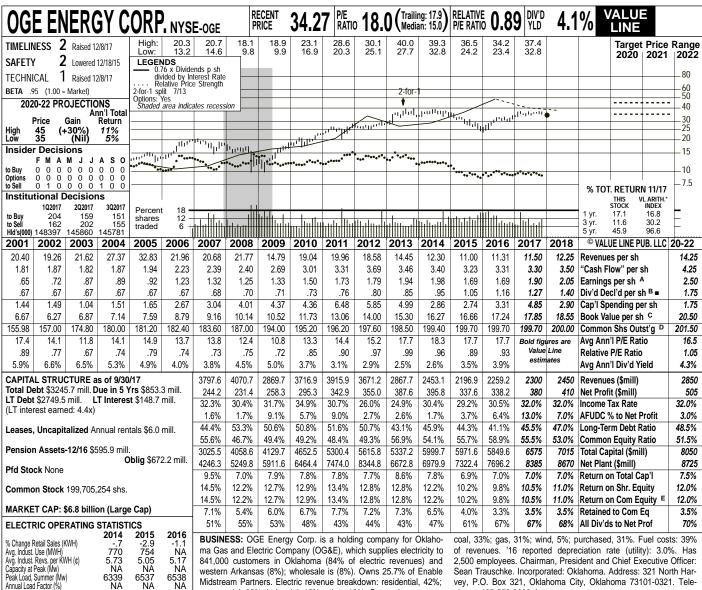
This stock's dividend yield is about a percentage point above the utility average. However, dividend growth prospects are ill-defined. Paul E. Debbas, CFA February 16, 2018

(A) Diluted EPS. Excl. nonrec. gain (losses): '10, (68¢); '11, 33¢; '12, (29¢); '13, (\$2.07); '14, (17¢); '15, (63¢); '16, (\$16.59); '17, (42¢); gain from disc. ops.: '14, 20¢. Next earnings report

due late Feb. (B) Div'ds paid early Mar., June, Sep. & Dec. 5 div'ds declared in '04, 3 in '13. Div'd reinvestment plan avail. (C) Incl. intang.: Div'd reinvestment plan avail. (E) Rate base: Div'd reinvestment plan avail. (E) Rate base: Div'd reinvestment plan avail. (E) Rate base: NJ Avg.; MD, WV Below Avg.

Company's Financial Strength Stock's Price Stability B+ 85 Price Growth Persistence 10 **Earnings Predictability** 40

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Midstream Partners. Electric revenue breakdown: residential, 42%; commercial, 25%; industrial, 15%; other, 18%. Generating sources:

vey, P.O. Box 321, Oklahoma City, Oklahoma 73101-0321. Telephone: 405-553-3000. Internet: www.oge.com.

356 314 336 Fixed Charge Cov. (% **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 -8.5% 2.0% 3.5% 7.5% 7.5% Revenues -8.5% 3.5% 'Cash Flow" 4.0% 6.0% Earnings 6.0% 4.5% 9.0% 3.5% Dividends Book Value 8.0%

+1.0

+1.2

+1.1

% Change Customers (vr-end)

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	560.4	611.8	754.7	526.2	2453.1
2015	480.1	549.9	719.8	447.1	2196.9
2016	433.1	551.4	743.9	530.8	2259.2
2017	456.0	586.4	716.8	540.8	2300
2018	475	600	800	575	2450
Cal-	EA	RNINGS P	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.25	.50	.94	.29	1.98
2015	.22	.44	.88	.15	1.69
2016	.13	.35	.92	.29	1.69
2017	.18	.52	.92	.28	1.90
2018	.20	.50	1.05	.30	2.05
Cal-	QUAR	TERLY DIV	IDENDS PA	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.209	.209	.209	.209	.84
2014	.225	.225	.225	.25	.93
2015	.25	.25	.25	.275	1.03
2016	.275	.275	.275	.3025	1.13
2017	.3025	.3025	.3025	.3325	

OGE Energy's utility subsidiary plans to file a rate case in Oklahoma soon. Oklahoma Gas and Electric will put forth an application to recover its \$390 million investment in a project to modernize the 462-megawatt Mustang gas-fired plant. A decision from the Oklahoma Corporation Commission is due 180 days after OG&E's filing. The company hopes the outcome of this case is far better than the one it received earlier this year, when it was granted just \$8.8 million of the \$92.5 million it requested. Note that in Arkansas, the utility will recover these costs through the state's formula rate plan.

We have trimmed our 2017 earnings estimate by a nickel a share. The summer weather conditions in OG&E's service area hurt earnings by \$0.08 a share in the third quarter. This prompted management to lower its profit target from \$1.93-\$2.09 a share to \$1.85-\$1.91 a share. Our revised estimate is near the upper end of this range.

We forecast an earnings increase of 8% in 2018. We base this on a return to normal weather patterns following unfavorable weather in 2017. If the decision in

the upcoming rate case turns out to be as unfavorable as the one in 2017, however,

our estimate might well prove optimistic.

The utility is building two environmental compliance projects. OG&E is adding scrubbers to two coal-fired units at a cost of \$542 million. It is also converting a coal-fired plant to a gas-fired facility at a cost of \$76 million. Each project is on track to be completed by the end of 2018.

The board of directors raised the

quarterly dividend by \$0.03 a share (9.9%), effective with the October payment. OGE Energy has been expecting 10% increases through 2019, so we expect similar growth next year. The company's dividend policy beyond then will depend on (among other things) the amount of distributions it receives from its 25.7% stake in Enable Midstream Partners, a midstream natural gas master limited partnershin.

This stock has a dividend yield that is above average, even for an electric company. Total return potential to 2020-2022 is also better than those of most utility issues.

Paul E. Debbas, CFA December 15, 2017

(A) Diluted EPS. Excl. nonrecurring losses: '02, 20¢; '03, 7¢; '04, 3¢; '15, 33¢; gains on discontinued operations: '02, 6¢; '05, 25¢; '06, 20¢. Next earnings report due late Feb. (B) Div'ds

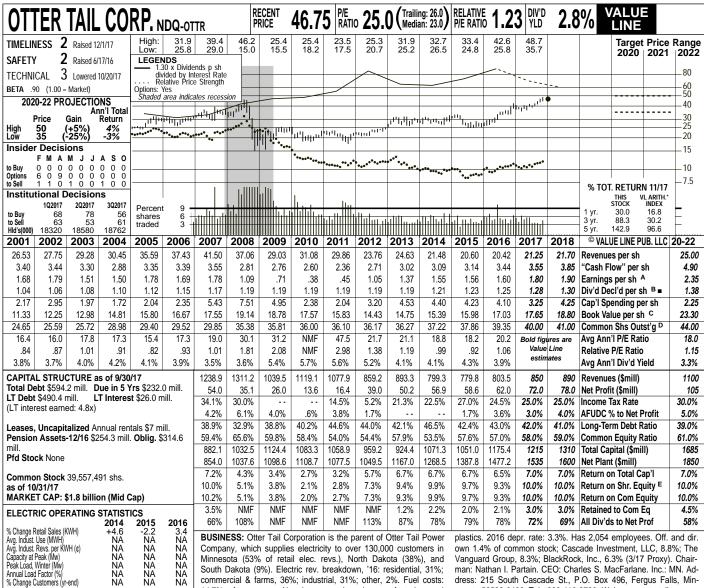
adj. for split. (E) Rate base: Net original cost.

historically paid in late Jan., Apr., July, & Oct. Rate allowed on com. eq. in OK in '16: 9.5%; in Div'd reinvestment plan available. (C) Incl. deferred charges. In '16: \$2.03/sh. (D) In millions, 10.0%. Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability 85 Price Growth Persistence 55 **Earnings Predictability** 80

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commercial & farms, 36%; industrial, 31%; other, 2%. Fuel costs: 14.7% of revenues. Also has operations in manufacturing and

dress: 215 South Cascade St., P.O. Box 496, Fergus Falls, Minnesota 56538-0496. Tel.: 866-410-8780. Web: www.ottertail.com

350 Fixed Charge Cov. (%) 336 348 ANNUAL RATES Est'd '14-'16 Past Past 5 Yrs. -7.0% 4.5% 10 Yrs. to '20-'22 of change (per sh) 3.0% 7.0% 7.0% Revenues -5.0% 'Cash Flow" - 5% Earnings Dividends 25.0% **Book Value** -1 5% 6.5%

Cal-			VENUES (\$ mill.) Dec.31	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	215.0	194.4	196.5	193.4	799.3
2015	202.8	188.2	200.0	188.8	779.8
2016	206.2	203.5	197.2	196.6	803.5
2017	214.1	212.1	216.5	207.3	850
2018	225	225	225	215	890
Cal-	EA	RNINGS F	ER SHAR	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.59	.27	.43	.28	1.55
2015	.37	.36	.42	.41	1.56
2016	.38	.41	.37	.44	1.60
2017	.49	.42	.45	.44	1.80
2018	.54	.44	.44	.48	1.90
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.298	.298	.298	.298	1.19
2014	.303	.303	.303	.303	1.21
2015	.308	.308	.308	.308	1.23
2016	.313	.313	.313	.313	1.25
2017	.320	.320	.320	.320	0
=:		0	0		

Shares of Otter Tail have traded higher over the past three months. The company reported good results for the third quarter. The top line increased roughly 10%, on a year-to-year basis. Share earnings of \$0.45 improved nearly 22% over the prior-year tally. This gain was driven by strength in the Plastics business, which benefited as its PVC pipe companies sold more product and earned greater-than-expected margins. Manufacturing segment earnings also improved. Results were less impressive at the utility. Earnings here fell roughly 13%, as greater costs more than offset a modest top-line advance. Looking forward, earnings per share may well remain flat for the December period, though we still expect a bottom-line gain of nearly 13% on moderate revenue growth for full-year 2017.

The utility has requested a rate review in North Dakota. On November 1st, Otter Tail Power Company filed a rate case with the North Dakota Public Service Commission. The utility has requested permission to increase nonfuel base rates by roughly \$13.1 million (8.7%). It cited rising costs, driven partly by required in-

vestment in environmental technologies. as reasons for the hike. Current rates in this territory were established back in 2009. A final determination here is not expected until well into 2018. Meantime, Otter Tail has asked to increase rates on an interim basis by about \$12.8 million, effective January 1, 2018.

We anticipate solid growth here from 2018 onward. The utility expects to invest \$862 million from 2017 through 2021. This includes two regional transmission projects, as well as new natural gas and wind generation. These outlays ought to result in strong growth in the utility rate base in the coming years. Elsewhere, the Plastics line should continue to fare well, and we expect improvement at the Manufacturing segment.

This stock is timely. Moreover, Otter Tail earns good marks for Safety, Financial Strength, and Price Stability. But total return potential appears limited, as the shares presently trade near the high end of our Target Price Range. Conservative, income-seeking accounts should probably look elsewhere at this juncture.

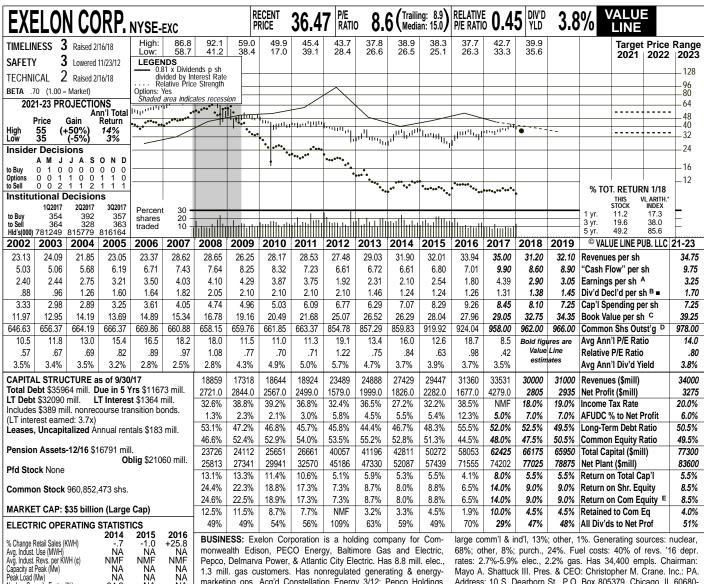
Michael Napoli, CFA December 15, 2017

(A) Diluted earnings. Excl. nonrecurring gains (losses): '10, (44¢); '11, 26¢; '13, 2¢; gains (losses) from discont. operations: '04, 8¢; '05, 33¢; '06, 1¢; '11, (\$1.11); '12, (\$1.22); '13, 2¢; March, June, Sept., and Dec. ■ Div'd reinvest-

'14, 2¢; '15, 2¢; '16, 1¢. Earnings may not sum due to rounding. Next earnings report due early February. (B) Div'ds historically paid in early Climate: MN, ND, Average; SD, Above Average.

Company's Financial Strength Stock's Price Stability 85 Price Growth Persistence 30 **Earnings Predictability** 55

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1.3 mill. gas customers. Has nonregulated generating & energymarketing ops. Acq'd Constellation Energy 3/12; Pepco Holdings 3/16. Elec. rev. breakdown: res'l, 63%; small comm'l & ind'l, 23%; Mayo A. Shattuck III. Pres. & CEO: Christopher M. Crane. Inc.: PA. Address: 10 S. Dearborn St., P.O. Box 805379, Chicago, IL 60680-5379. Tel.: 312-394-7398. Internet: www.exeloncorp.com

Fixed Charge Cov. (%)		263	367	238
ANNUAL RATES of change (per sh)	Past 10 Yrs.	Past 5 Yrs.	to	'14-'16 21-'23
Revenues "Cash Flow"	3.5% 1.0% -4.0%	3.5% -3.0% -11.5%	6	1.0% 5.5% 6.0%
Earnings Dividends Book Value	-2.0% 7.0%	-10.0%		4.5% 5.5%

Nuclear Capacity Factor (%) % Change Customers (vr-end)

NA 94.3

+.6

NA

+1.1

NA

+33.7

Cal- endar	QUAR Mar.31		VENUES (Full Year
2015 2016 2017 2018 2019	8830 7573 8757 7900 8150	6514 6910 7623 6800 7050	7401 9002 8769	6702 7875 8382 7400 7650	29447 31360 33531 30000 31000
Cal- endar	EA Mar.31	RNINGS F Jun.30	ER SHARI Sep.30	Dec.31	Full Year
2015 2016 2017 2018 2019	.80 .26 .83 .90	.74 .45 .44 .55	.69 .76 .95 .90	.33 .32 1.90 .55	2.54 1.80 4.39 2.90 3.05
Cal- endar	QUAR Mar.31		IDENDS PA	AID B ■ Dec.31	Full Year
2014 2015 2016 2017 2018	.31 .31 .31 .3275	.31 .31 .318 .3275	.31 .31 .318 .3275	.31 .31 .318 .3275	1.24 1.24 1.26 1.31

Exelon's utilities have several rate **cases pending.** The utilities that Exelon acquired two years ago in the Pepco Holdings deal are not earning adequate returns on equity, so they have been filing rate applications. In Maryland, Delmarva Power reached a settlement calling for an electric increase of \$13.4 million, based on a 9.5% return on equity. The commission was expected to rule on the agreement shortly after this report went to press. In Delaware, the utility is seeking electric and gas increases totaling \$41.2 million, based on a 10.1% ROE. A ruling is expected in the third quarter. In Maryland, Pepco requested a \$41.4 million electric increase, based on a 10.1% ROE. An order is expected in the third period. In Washington, DC, the utility filed for a \$66.2 million electric hike, based on a 10.1% ROE. A decision is expected in the fourth quarter. These figures are before the benefits of a lower tax rate are passed on to customers.

The nonutility businesses are facing difficult industrywide conditions. Low gas prices, subsidized renewable energy, and sluggish demand for electricity have reduced` the profitability of Exelon's

nuclear units. A plant in New Jersey is closing in 2018 (a year ahead of schedule), and a facility in Pennsylvania will be shut in 2019 unless the state grants subsidies similar to those that have been provided in New York and Illinois. These subsidies will contribute to profits this year.

The new federal tax law boosted earn-

ings by \$1.30 a share in the fourth quarter of 2017, and will help the nonutility operations. Our 2018 shareearnings estimate, which we raised by \$0.15 a share, is at the low end of Exelon's guidance of \$2.90-\$3.20 a share.

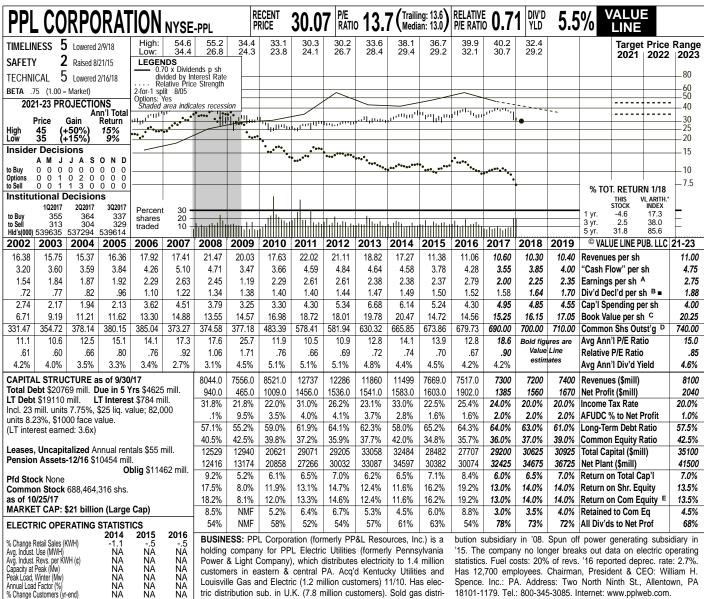
Exelon revised its dividend policy. Previously, this called for annual increases of 2.5% through 2018. Now, the company's improved prospects have induced the board to set a target of 5% yearly growth through 2020. We estimate a hike of \$0.07 a share (5.3%) in the annual payout this vear.

This stock has a dividend yield that is about equal to the industry average. The equity should produce respectable (by utility standards) total returns over the 3to 5-year period. Paul E. Debbas, CFA February 16, 2018

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(A) Dil. egs. Excl. nonrec. gain (losses): '03, chg. in shs. Next earnings report due early | all'd on com. eq. in IL in '15: 9.25%; in MD (\$1.06); 05, (\$1.85); '06, (\$1.15); '09, (20¢); May. (B) Div'ds paid in early Mar., June, Sept., '16: 9.75% elec., 9.65% gas; in NJ in '1' '12, (50¢); '13, (31¢); '14, 23¢; '16, (58¢); '17, & Dec. ■ Div'd reinv, plan avail. (C) Incl. defd | 9,75%; earned on avg. com. eq. '16: 6.4¢ (42¢). '15-'17 EPS don't add due to rounding or chgs. In '16: \$18.58/sh. (D) In mill. (E) Rate | Reg. Clim.: PA, NJ Avg.; IL, MD, Below Avg. chg. in shs. Next earnings report due early Mar., June, Sept., '16: 9.75% elec., 9.65% gas; in NJ in '16: 8. Dec. ■ Div'd reinv. plan avail. (C) Incl. def'd 9.75%; earned on avg. com. eq., '16: 6.4%. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part

Company's Financial Strength Stock's Price Stability B++ 85 Price Growth Persistence 10 **Earnings Predictability** 55



Louisville Gas and Electric (1.2 million customers) 11/10. Has electric distribution sub. in U.K. (7.8 million customers). Sold gas distri-

Spence. Inc.: PA. Address: Two North Ninth St., Allentown, PA 18101-1179. Tel.: 800-345-3085. Internet: www.pplweb.com.

ANNUAL RATES Past F		d '14-'16
of change (per sh) 10 Yrs. 5 Revenues -2.0% - "Cash Flow" 1.0% Earnings 2.0%	Yrs. to 8.0% 1.5% 4.5% 1.5%	'21-'23 NMF NMF NMF NMF 3.5% NMF

Annual Load Factor (%)
% Change Customers (vr-end)

Cal- endar	QUAR Mar.31	TERLY RE Jun.30	VENUES (Sep.30		Full Year
2015	2230	1781	1878	1780	7669
2016	2011	1785	1889	1832	7517
2017	1951	1725	1845	1779	7300
2018	1925	1700	1825	1750	7200
2019	1975	1750	1875	1800	7400
Cal-	EA	RNINGS P	ER SHAR	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	.82	.37	.59	.60	2.37
2016	.71	.71	.69	.68	2.79
2017	.59	.43	.51	.47	2.00
2018	.65	.50	.57	.53	2.25
2019	.68	.52	.60	.55	2.35
Cal-	QUAR	TERLY DIV	IDENDS P	AID B ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.3675	.3725	.3725	.3725	1.49
2015	.3725	.3725	.3725	.3775	1.50
2016	.3775	.38	.38	.38	1.52
2017	.38	.395	.395	.395	1.57
2018	.395				

There is no obvious explanation for the poor performance of PPL Corporation's stock. The share price declined 12% in 2017, which was an excellent year for most utility issues. The industry's laggards last year had problems with nuclear construction, troubled nonutility subsidiaries, or wildfires in California. PPL doesn't fall into any of these categories. We think the market is worried about the possibility of regulatory changes in the United Kingdom that would hurt the profitability of the company's utilities there. Speculation that PPL's dividend might be at risk has emerged, as well.

We are sticking with our 2018 earnings estimate of \$2.25 a share, and see no threat to the dividend. In fact, we continue to expect an increase of \$0.06 a share (3.8%) in the annual payout this year. In 2018, PPL's utilities in Kentucky will benefit from a full year's effect of electric and gas tariff hikes that went into effect in mid-2017. We assume normal weather conditions; mild weather hurt the bottom line last year. Perhaps the market's worries about PPL are waning, as the stock price has declined just slightly so far

this year (not as much as the falloff of most utility equities).

Currency movements add uncertainty to our earnings estimates. PPL uses hedges due to its exposure to the British pound. This led to currency hedging losses in the first nine months of 2017. (Fourthquarter results were scheduled to be released shortly after this report came out in print.) Depending on the exchange rate, there is upside potential to PPL's earnings, too. We assume no currency gains or losses in our estimates or projections, but will include these once they are booked.

PPL's two utilities in Kentucky have requested permission to install an advanced metering system. If the state commission approves the project, the utilities would spend \$313 million to install 1.3 million meters over a three-year period. The companies asked for an order by June

This stock is untimely, but offers an attractive dividend yield. This is almost two percentage points above the utility average. Total return potential to 2021-2023 is also attractive.

Paul E. Debbas, CFA February 16, 2018

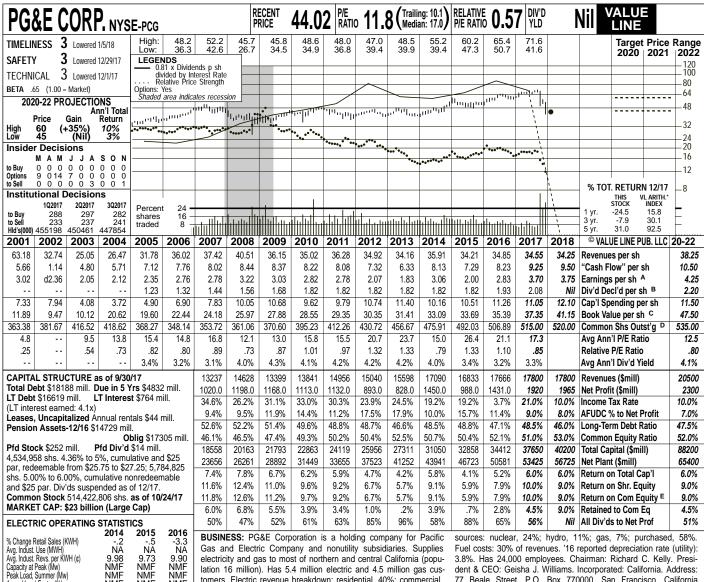
(A) Dil. EPS. Excl. nonrec. gain (losses): '07, (12¢); '10, (8¢); '11, 8¢; '13, (62¢); gains (losses) on disc. ops.: '07, 19¢; '08, 3¢; '09, (10¢); '10, (4¢); '12, (1¢); '14, 23¢; '15, (\$1.36).

'15 EPS don't sum to rounding. Next earnings report due late Feb. (B) Div'ds historically paid in early Jan., Apr., July, & Oct. ■ Div'd reinv. plan avail. (C) Incl. intang. In '16: \$8.35/sh.

(D) In mill., adj. for split. (E) Rate base: Fair val. Rate all'd on com. eq. in PA in '16: none spec.; in KY in '17: 9.7%; earned on avg. com. eq., '16: 19.2%. Regul. Climate: Avg.

Company's Financial Strength Stock's Price Stability B++ 95 Price Growth Persistence 15 **Earnings Predictability** 70

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lation 16 million). Has 5.4 million electric and 4.5 million gas customers. Electric revenue breakdown: residential, 40%; commercial, 39%; industrial, 11%; agricultural, 9%; other, 1%. Generating

dent & CEO: Geisha J. Williams. Incorporated: California. Address: 77 Beale Street, P.O. Box 770000, San Francisco, California 94177. Telephone: 415-973-1000. Internet: www.pgecorp.com.

189 242 304 Fixed Charge Cov. (% ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 5 Yrs. to '20-'22 Revenues 1.0% -.5% 1.5% -1.0% -2.0% 'Cash Flow" 1.5% 1.0% 5.0% 8.5% Earnings 1.0% 3.5% Dividends Book Value

% Change Customers (vr-end)

NMF

+.6

NMF

NMF

NMF

+.7

Cal- endar			VENUES (Sep.30		Full Year
2014	3891	3952	4939	4308	17090
2015	3899	4217	4550	4167	16833
2016	3974	4169	4810	4713	17666
2017	4268	4250		4765	17800
2018	4300	4300	4600	4600	17800
Cal-	EA.	RNINGS F	ER SHARI	E A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.49	.57	1.71	.27	3.06
2015	.27	.83	.63	.27	2.00
2016	.22	.46	.77	1.36	2.83
2017	1.13	.79	1.07	.71	3.70
2018	1.10	.85	1.10	.70	3.75
Cal-	QUAF	RTERLY DI	VIDENDS F	PAID B	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.455	.455	.455	.455	1.82
2015	.455	.455	.455	.455	1.82
2016	.455	.455	.49	.49	1.89
2017	.49	.49	.53	.53	2.04
2018					

PG&E's board of directors suspended the dividend of the company's common stock. The move came as a result of concerns about a possibly huge liability for damages resulting from wildfires in northern California. (The causes have not yet been determined.) Also, the board of directors of the company's utility subsidiary, Pacific Gas and Electric, suspended the dividend of its preferred stock.

The price of PG&E stock has plummeted almost 40% from its 52-week high. The slide began in mid-October, due to the market's worries about the financial impact of the wildfires. The dividend suspension, announced on December 20th, surprised Wall Street. The big problem is California's inverse condemnation law. This means the utility may be liable for damages (and attorneys' fees) caused by its power lines, even if the utility followed established inspection and safety rules. The California Public Utilities Commission (CPUC) has expressed concern about this law, but whether the state legislature is inclined to change the law is unknown. PG&E has about \$800 million of liability

insurance for the wildfires, but claims might well exceed this amount considerably. The utility estimates that it will incur capital and operating costs of \$160 million-\$200 million to restore service and make repairs. There is no assurance that the CPUC will allow it to pass these costs through to ratepayers. In 2017, the regulators denied recovery of wildfire costs to another utility in the state.

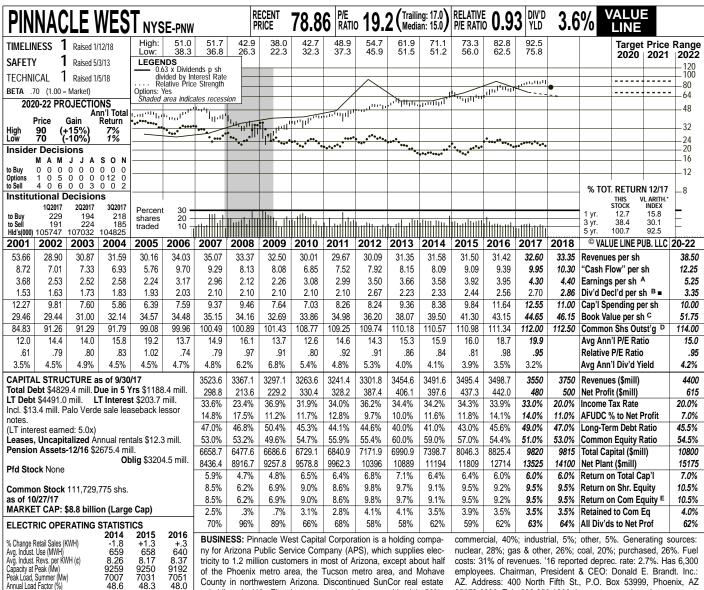
There is a lot of uncertainty associated with the wildfire-related matters. Any reserves for potential liability (along with insurance recoveries) will be included in our earnings presentation. This will make PG&E's profits virtually impossible to predict. Also highly uncertain is when the board of directors will restore a dividend, and at what level. The company stated it will "revisit the issue as we get more clarity.

There is too much uncertainty here, even for risk-tolerant utility investors. The potential rewards aren't worth the risks, in our view, and investors will not get any dividend income while they wait for resolution of the wildfire matters Paul E. Debbas, CFA January 26, 2018

(A) Diluted EPS. Excl. nonrecurring gains (losses): '04, \$6.95; '09, 18¢; '11, (68¢); '12, (15¢); '15, (21¢); '16, (5¢); gain from discontinued operations: '08, 41¢. '14 & '16 EPS don't (S15.69/sh. (D) In mill. (E) Rate base: net original network of the control of the control

Company's Financial Strength Stock's Price Stability 90 Price Growth Persistence 30 **Earnings Predictability** 45

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subsidiary in '10. Electric revenue breakdown: residential, 50%;

AZ. Address: 400 North Fifth St., P.O. Box 53999, Phoenix, AZ 85072-3999. Tel.: 602-250-1000. Internet: www.pinnaclewest.com.

404 438 416 Fixed Charge Cov. (%) Past ANNUAL RATES Past Est'd '14-'16 of change (per sh) 10 Yrs. 5 Yrs. to '20-'22 Revenues .5% 3.5% 3.5% 6.5% 3.0% 4.0% 'Cash Flow' 1.5% 3.5% 5.5% 5.5% Earnings Dividends Book Value 5.5% 4.0%

+1.2

+1.3

+1.3

% Change Customers (vr-end)

Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year
2014	686.2	906.3	1172.7	726.4	3491.6
2015	671.2	890.7	1199.1	734.4	3495.4
2016	677.2	915.4	1166.9	739.2	3498.7
2017	677.7	944.6	1183.3	744.4	3550
2018	725	975	1275	775	3750
Cal-	EA	RNINGS F	PER SHARI	ΕA	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.14	1.19	2.20	.05	3.58
2015	.14	1.10	2.30	.37	3.92
2016	.04	1.08	2.35	.47	3.95
2017	.21	1.49	2.46	.14	4.30
2018	.20	1.30	2.60	.30	4.40
Cal-	QUART	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.5675	.5675	.5675	.595	2.30
2015	.595	.595	.595	.625	2.41
2016	.625	.625	.625	.655	2.53
2017	.655	.655	.655	.695	2.66
2018					

estimate that Pinnacle earnings will advance modestly in **2018.** The company's utility subsidiary, Arizona Public Service, will benefit from a full year's effect of the \$94.6 million (3.3%) rate increase that took effect on August 19th. Modest kilowatt-hour sales growth (even after the effects of energy efficiency measures) will likely help, too. Offsetting this will be an increase in expenses associated with planned maintenance outages of fossil (coal or gas) plants. Accordingly, we have trimmed our 2018 earnings estimate by \$0.10 a share, to \$4.40. Our revised forecast is within Pinnacle West's targeted range of \$4.25-\$4.45 a share. Meanwhile, our 2017 profit estimate is at the upper end of the company's guidance of \$4.15-\$4.30 a share.

Two significant capital projects are under construction. APS is adding pollution control equipment to Units 4 and 5 of the Four Corners coal-fired station. This project is on track for completion in the spring of 2018 at a cost of \$400 million. These costs will be deferred until the utility can recover them in rates at the start of 2019. APS is also modernizing a gas-fired

plant by building five units and shutting two old ones. This will provide a net increase in generating capacity of 290 megawatts. This project is scheduled for completion in the spring of 2019 at a cost of \$500 million. Costs here will be deferred until the company receives an order in its next general rate case. This will probably come in mid-2020 after APS puts forth an

application in June of 2019.

Finances are strong. The fixed-charge coverage is well above the industry average. The common-equity ratio is healthy, and the company expects no need for additional equity in the next few years. Earned returns on equity have consistently been between 9% and 10% in recent years, and we project they will remain there. Pinnacle West merits a Financial Strength rating of A+.

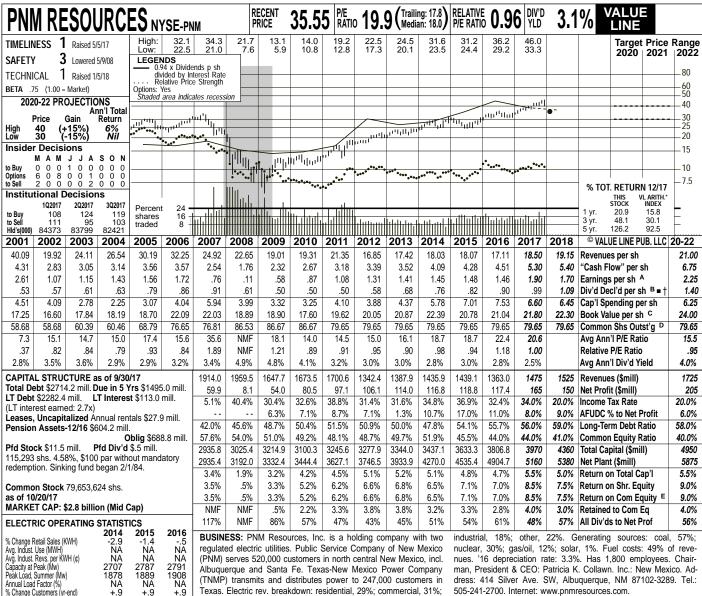
Timely and high-quality Pinnacle West stock has a dividend yield that is average for a utility. Like most electric utility equities, the recent price is within our 3- to 5-year Target Price Range. Accordingly, total return potential is unspectacular.

Paul E. Debbas, CFA January 26, 2018

(A) Diluted EPS. Excl. nonrec. losses: '02, 77¢; sum due to rounding. Next earnings report due '09, \$1.45; excl. gains (losses) from disc. ops.: '05, (36¢); '06, 10¢; '08, 28¢; '09, (13¢); '10, 18¢; '11, 10¢; '12, (5¢). '15 & '16 EPS don't rations in '12. ■ Div'd reinvest. plan avail. (C) Incl. deferred chgs. In '16: \$14.54/sh. (D) In mill. (E) Rate base: Fair value. Rate allowed on com. eq. in '17: 10%; earned on avg. com. eq., '16: 9.4%. Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability A+ 95 Price Growth Persistence 70 **Earnings Predictability** 95

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(TNMP) transmits and distributes power to 247,000 customers in Texas. Electric rev. breakdown: residential, 29%; commercial, 31%;

dress: 414 Silver Ave. SW, Albuquerque, NM 87102-3289. Tel.: 505-241-2700. Internet: www.pnmresources.com

236 231 202 Fixed Charge Cov. (% **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 -5.0% 2.5% -.5% -2.5% 9.5% 11.5% Revenues 3.0% 'Cash Flow" 8.0% 7.5% Earnings Dividends Book Value 10.5% 9.0% 2.0%

% Change Customers (vr-end)

ŇĀ

+.9

ΝA

+.9

Cal- endar	QUAR Mar.31		VENUES (Sep.30	mill.) Dec.31	Full Year
2014 2015 2016 2017 2018	328.9 332.9 311.0 330.2 345	346.2 352.9 315.4 362.3 370	413.9 417.4 400.4	346.9 335.9 336.2 362.6 370	1435.9 1439.1 1363.0 1475 1525
Cal- endar		RNINGS F Jun.30	ER SHARE Sep.30	Dec.31	Full Year
2014 2015 2016 2017 2018	.16 .18 .13 .28	.36 .40 .34 .47 .39	.69 .76 .68 .92	.24 .13 .31 .23 .33	1.45 1.48 1.46 1.90 1.70
Cal- endar	QUARTI Mar.31	ERLY DIVII Jun.30	DENDS PAI Sep.30	D B ■ † Dec.31	Full Year
2014 2015 2016 2017 2018	.185 .20 .22 .2425 .265	.20	.20 .22	.185 .20 .22 .2425	.74 .80 .88 .97

PNM Resources' utility subsidiary in New Mexico received a disappointing rate order. Public Service Company of New Mexico filed for a rate increase of \$99.2 million, based on a 10.125% return on equity. The utility reached a settlement with the commission's staff, the state's attorney general, and most intervenors calling for a \$53.2 million hike (before the effects of lower income taxes), based on a 9.575% ROE. However, the commission took the position of an intervenor that was not part of the settlement and modified the agreement to exclude costs associated with an environmental upgrade to the Four Corners coal-fired plant. This might well force the utility to take a nonrecurring charge (estimated at as much as \$60 million before taxes, but possibly less). The company asked the regulators to add \$4.7 million to the order to clarify an inconsistency with it. The stock price is down more than 15% since the ruling came out on December 20th.

Earnings are likely to decline this year, but should improve materially in 2019. The aforementioned rate hike will be phased in over a two-year period,

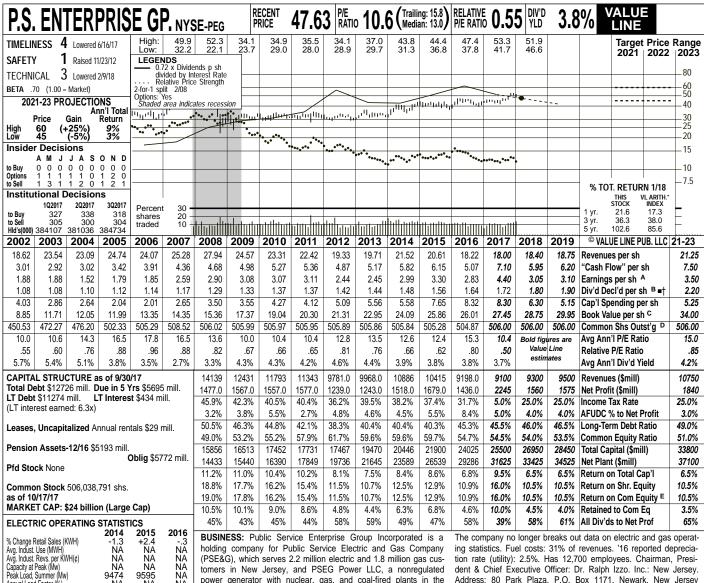
so PNM will feel the effects of regulatory lag in 2018. Our profit estimate is at the low end of management's targeted range of \$1.70-\$1.80 a share, which is below its expectation of \$1.85-\$1.90 for 2017. Because the full increase will be in effect for all of 2019, earnings might well exceed \$2.00 a share. The company should also benefit from rate relief in Texas, given that its utility in the Lone Star State plans to file a general rate case in May of 2018. New tariffs are expected to take effect in January of 2019.

The board of directors raised the annual dividend by \$0.09 a share (9.3%). The move is effective with the payment in the current quarter. PNM's goal is a payout ratio of 50%-60%.

PNM stock is ranked favorably for **Timeliness.** However, the dividend yield is low, by utility standards, and total return potential to 2020-2022 is also subpar. And PNM's New Mexico utility operates in a state with a subpar regulatory climate. Note that its appeal of the commission's order in the 2015 general rate case is still pending before the state supreme court. Paul E. Debbas, CFA January 26, 2018

(A) Dil. EPS. Excl. nonrec. gains (losses): '01, | EPS don't sum due to rounding. Next egs. re- | '16: \$10.73/sh. (D) In mill., adj. for split. (E) | (15¢); '03, 67¢; '05, (56¢); '08, (\$3.77); '10, | (\$1.36); '11, 88¢; '13, (16¢); '15, (\$1.28). Excl. gains from disc. ops.: '08, 42¢; '09, 78¢. '15 | † Shrhldr. invest. plan avail. (C) Incl. intang. In | 7.0%. Reg. Climate: NM, Below Avg.; TX, Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product

Company's Financial Strength Stock's Price Stability B+ 90 Price Growth Persistence **Earnings Predictability** 70



tomers in New Jersey, and PSEG Power LLC, a nonregulated power generator with nuclear, gas, and coal-fired plants in the Northeast. PSEG Energy Holdings is involved in renewable energy.

dent & Chief Executive Officer: Dr. Ralph Izzo. Inc.: New Jersey. Address: 80 Park Plaza, P.O. Box 1171, Newark, New Jersey 07101-1171. Telephone: 973-430-7000. Internet: www.pseg.com.

522 635 705 Fixed Charge Cov. (%) ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '21-'23 -3.0% 2.0% -.5% Revenues -1.5% 1.0% 5.0% 6.0% 'Cash Flow" 4.0% 2.0% Earnings 3.0% 6.0% Dividends Book Value 5.0% 4.5%

% Change Customers (avg.)

NA NA

NA NA NA

9595

NA NA

Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year
2015	3135	2314	2688	2278	10415
2016	2616	1905	2587	2090	9198.0
2017	2592	2133	2263	2112	9100
2018	2700	2050	2400	2150	9300
2019	2750	2100	2450	2200	9500
Cal-	EA	RNINGS P	ER SHARE	Dec.31	Full
endar	Mar.31	Jun.30	Sep.30		Year
2015 2016 2017 2018 2019	1.15 .93 .94 1.05 1.05	.68 .37 .69 .60	.87 .94 .79 . 85	.60 .59 1.98 . 55	3.30 2.83 4.40 3.05 3.10
Cal-	QUARTI	Full			
endar	Mar.31	Year			
2014 2015 2016 2017 2018	.37 .39 .41 .43	.37 .39 .41 .43	.37 .39 .41 .43	.37 .39 .41 .43	1.48 1.56 1.64 1.72

Public Service Enterprise Group's utility subsidiary has filed a general rate case. Public Service Electric and Gas requested electric and gas rate hikes of \$27 million (0.5%) and \$68 million (3.0%), respectively, based on a return of 10.3% on a common-equity ratio of 54%. This is PSE&G's first base-rate application since 2010. Despite regulatory mechanisms allowing current recovery of certain expenditures for its storm hardening and gas system modernization programs, some of these costs are still unrecovered. A lack of growth is another problem. PSE&G also wants a higher depreciation rate, recovery of storm-related costs that have been deferred until now, and a regulatory mechanism to decouple electric revenues and volume. The company expects new tariffs and the decoupling mechanism to take effect at the start of October.

Our 2017 earnings estimate requires **an explanation.** For the fourth quarter, PSEG expects to book a credit of \$660 million-\$850 million for the effect of the new federal tax law on deferred tax balances. This is *included* in our earnings presentation.

The utility business is faring better than the nonregulated operations. PSE&G is benefiting from growth in its federally regulated transmission business, which obtains rate relief annually through a forward-looking regulatory mechanism. (A \$64 million rate increase took effect at the start of 2018.) Unless the utility receives harsh treatment from the New Jersey regulators, the rate order will boost the earning power of PSE&G's distribution business. PSEG Power, the main nonregulated subsidiary, is still experiencing difficult market conditions, but should benefit from a lower federal tax rate. We forecast flat earnings in 2019.

We think the board of directors will raise the dividend soon. We estimate a boost of \$0.02 a share (4.7%) in the quarterly payout, the same increase as in each

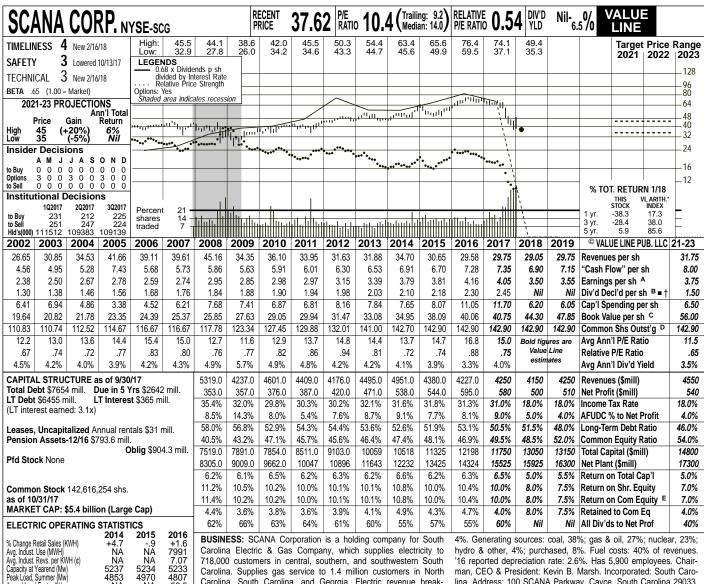
of the past three years.

This high-quality but untimely stock has a dividend yield that is about average for a utility. Like most utility equities, the recent price is within our 2021-2023 Target Price Range. Accordingly, total return potential is unspectacular. Paul E. Debbas, CFA February 16, 2018

(A) Diluted EPS. Excl. nonrecur. gain (losses): '02, (\$1.30); '05, (3¢); '06, (35¢); '08, (96¢); '09, 6¢; '11, (34¢); '12, 7¢; '16, (30¢); '17, (\$1.20); gains (loss) from disc. ops.: '05, (33¢); © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

'06, 12¢; '07, 3¢; '08, 40¢; '11, 13¢. Next egs. (C) Incl. intang. In '16: \$6.80/sh. (D) In mill., report due late Feb. (B) Div'ds histor. paid in late Mar., June, Sept., and Dec. ■ Div'd reinallowed on com. eq. in '10: 10.3%; earned on vest. plan avail. † Sharehold. invest. plan avail. | avg. com. eq., '16: 10.8%. Reg. Climate: Avg.

Company's Financial Strength Stock's Price Stability A++ 95 Price Growth Persistence 20 **Earnings Predictability** 65



Carolina, South Carolina, and Georgia. Electric revenue breakdown: residential, 46%; commercial, 33%; industrial, 17%; other,

lina. Address: 100 SCANA Parkway, Cayce, South Carolina 29033. Telephone: 803-217-9000. Internet: www.scana.com

307 323 319 Fixed Charge Cov. (% **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '21-'23 -2.0% 3.5% 6.0% 3.0% 5.5% -2.0% 1.5% 4.0% Revenues Nil 'Cash Flow' Earnings 3.5% 5.0% -5.5% 6.0% Dividends Book Value

% Change Customers (vr-end)

+1.4

ΝA

+1.5

+1.6

endar	Mar.31		VENUES (Sep.30		Full Year
2015	1389	967	1068	956	4380.0
2016	1172	905	1093	1057	4227.0
2017		1001	1076	1000	4250
2018	1150	950	1050	1000	4150
2019	1200	950	1100	1000	4250
Cal-	EA	RNINGS F	PER SHAR	ΕA	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	1.39	.69	1.04	.69	3.81
2016	1.23	.74	1.32	.87	4.16
2017	1.19	.85	1.16	.85	4.05
2018	1.10	.67	1.00	.73	3.50
2019	1.10	.70	1.00	.75	3.55
Cal-	QUART	ERLY DIVI	DENDS PA	AID B∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.508	.525	.525	.525	2.08
2015	.525	.545	.545	.545	2.16
2016	.545	.575	.575	.575	2.27
2017	.575	.6125	.6125	.6125	2.41
2018	.6125				

SCANA has accepted a takeover offer from Dominion Energy. Dominion would pay .669 of a share of its stock (valued at \$49.58) for each SCANA share. deal requires the approval SCANA's stockholders, the regulatory commissions in South Carolina, North Carolina, and Georgia, and the Federal Energy Regulatory Commission. The companies expect the deal to be completed by the third quarter of 2018. However

There is much doubt that the deal will **be completed.** Regulatory uncertainty is inherent in any proposed utility combination, but even more so in this one. The crux of the problem is the nuclear construction project that SCANA's electric utility subsidiary, South Carolina Electric & Cas, canceled due to extensive delays and cost overruns. This led to a 46% decline in the price of SCANA stock in 2017. Dominion has stated it would pay \$1.3 billion to SCE&G's electric customers, forgo recovery of \$1.7 billion of costs associated with the unsuccessful project, and avoid seeking recovery of a gas-fired plant that SCE&G intends to buy for \$180 million. The state House of Representatives has

voted to temporarily halt the payments customers are making for the canceled units. Dominion may walk away from the acquisition if the regulators and/or the South Carolina legislature make changes that would hurt the economics of it.

The recent price of SCANA stock is 24% below the value of Dominion's offer. Such a wide gap indicates the market's belief that the proposed acquisition will fall through. If this happens, a writedown of nuclear costs far greater than \$1.7 billion might well occur. (We are excluding from our earnings presentation any nuclear-related charges.) Indeed, the South Carolina commission's staff is pushing for a \$445 million rate reduction. Intrepid investors will get an outsized return if the takeover is completed, but most accounts should avoid the stock. Because the equity is no longer trading on the basis of Dominion's offer, we reinstated its Timeliness rank, which is 4 (Below Average).

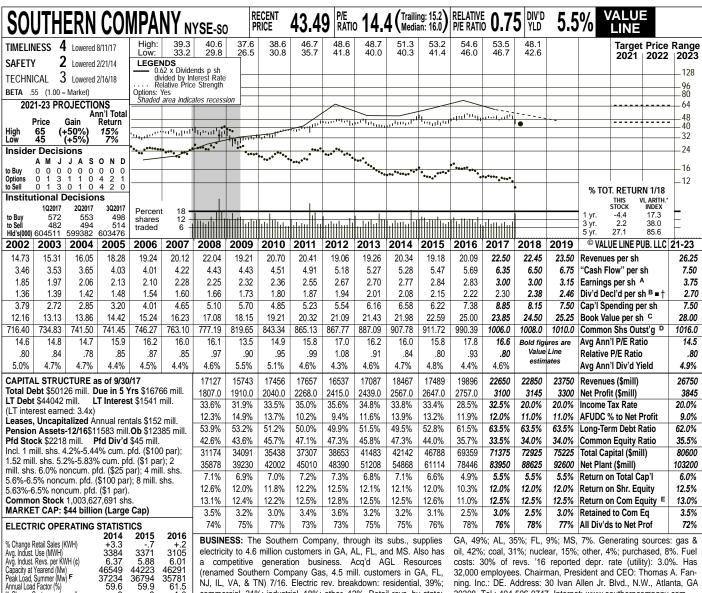
What about the dividend? The regulatory and legislative risks make us suspect the payout will be suspended, even while the deal with Dominion is pending. Paul E. Debbas, CFA February 16, 2018

(A) Diluted earnings. Excl. nonrecurring gains (losses): '02, (\$3.72); '03, 31¢; '04, (23¢); '05, 3¢; '06, 9¢; '15, \$1.41; '17, (92¢). Next earnings report due late Feb. (B) Div'ds historically paid in early Jan., Apr., July, & Oct. Div'd reinvestment plan avail. Shareholder investment plan avail. (C) Incl. intangibles. In '16: \$14.91/sh. (D) In millions. (E) Rate base: Net

original cost. Rate allowed on com. eq. in SC: 10.25% elec. in '13, 10.25% gas in '05; in NC: 9.7% in '16; earned on avg. com. eq., '16: 10.7%. Regulatory Climate: Above Average

Company's Financial Strength Stock's Price Stability B+ 80 Price Growth Persistence 40 **Earnings Predictability** 100

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59.9 61.5 +.9 433 330 Est'd '14-'16 to '21-'23 4.0% 3.5% 3.0% 3.5% 4.5% 4.0% 3.5%

2.5%

Book Value QUARTERLY REVENUES (mill.) endar Mar.31 Jun.30 Sep.30 Dec.31 Year 4183 4337 17489 2015 5401 3568 6264 19896 4459 5181 2016 3992 5430 2017 5771 6201 5248 22650 5450 2018 5850 6250 5300 22850 5500 23750 2019 6100 5650 6500 EARNINGS PER SHARE A Cal-Mar.31 Dec.31 endar Jun.30 Sep.30 Year 2015 .56 .42 2.84 1.16 2016 .57 .33 2.83 .71 1.22 .73 .73 1.08 .46 3.00 2017 2018 .70 .75 1.10 .45 3.00 .45 3.15 2019 .75 .80 1.15 QUARTERLY DIVIDENDS PAID B = † Cal-Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year 2014 .508 .525 .525.5252.08 .525 2015 .5425.5425 .5425 2.15 5425 2016 .56 .56 .56 2.22 .56 58 .58 2.30 2017 .58

59.6

417

10 Yrs.

1.0%

3.5% 3.0%

5.0%

Past

5 Yrs.

4.0%

% Change Customers (yr-end)

Fixed Charge Cov. (%)

of change (per sh)

Cash Flow'

Revenues

Earnings

Dividends

2018

.58

ANNUAL RATES

commercial, 31%; industrial, 18%; other, 12%. Retail revs. by state: Southern Company's Georgia Power subsidiary has received permission from the state commission to continue its nuclear construction project. The utility is adding two units at the site of the Vogtle station. Delays and cost overruns added \$1.4 billion to the construction cost, making it \$8.8 billion. The problem led to the bankruptcy filing of the former con-

tractor, Westinghouse, so its parent, Toshiba, paid Georgia Power \$1.7 billion in loan guarantees. Of this amount, \$1.5 billion will offset the construction work in progress, and \$188 million will be credited to customers. The net effect of all of this is that Southern's earning power will be trimmed by \$0.04 a share in 2018. Accord-

ingly, we have lowered our share-earnings estimate by a nickel, to \$3.00.

Mississippi Power's regulatory settlement was approved by the state commission. The utility's coal-gasification plant had extensive delays and cost overruns, and is being run as a gas-fired facility. In recent years, the problems forced Mississippi Power to take writedowns, including more than \$2.2 billion after taxes in 2017. The settlement resolved all regu-

latory matters associated with this project. and put an end to the nonrecurring charges.

30308. Tel.: 404-506-0747. Internet: www.southerncompany.com.

The sale of two gas utilities is pending. Southern agreed to sell Elizabethtown Gas and Elkton Gas for \$1.7 billion. It will use the proceeds to offset some of its equity needs. The sale is expected to be completed by the third quarter of 2018.

We think earnings will advance in 2019. Southern should benefit from rate relief, modest volume growth, and increased income from its Southern Power nonutility subsidiary.

A dividend hike is likely in the second quarter. This is the usual timing of the dividend review. We think Southern will continue the \$0.08-a-share annual growth rate it established in 2017. We project the company will maintain this pace over the 3- to 5-year period.

This stock is untimely, but offers an attractive dividend yield. The yield is almost two percentage points above the utility mean. Total return potential through the 2021-2023 period is respectable.

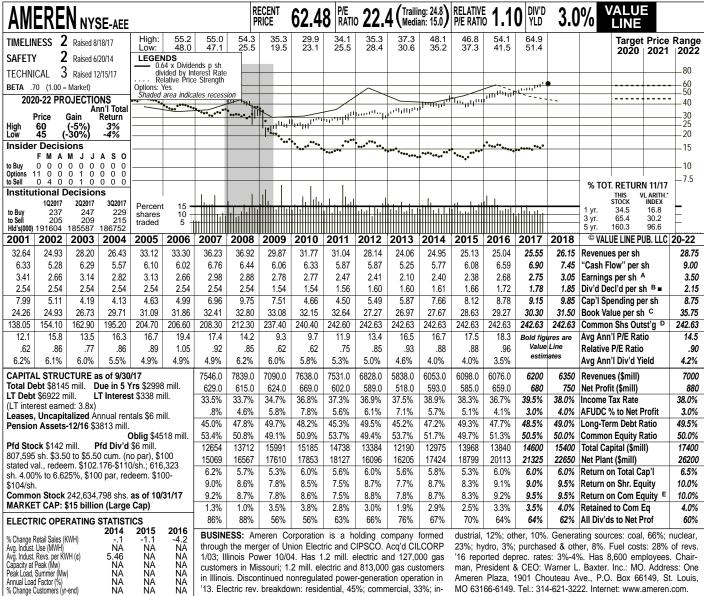
Paul E. Debbas, CFA February 16, 2018

(A) Dil. EPS. Excl. nonrec. gain (losses): '03, 6¢; '09, (25¢); '13, (83¢); '14, (59¢); '15, (25¢); '16, (28¢); '17, (\$2.20). '15 EPS don't sum due to rounding. Next egs. report due late Feb.

(B) Div'ds paid in early Mar., June, Sept., and Dec. ■ Div'd reinvest. plan avail. † Shrhldr. invest. plan avail. (C) Incl. def'd chgs. In '16: \$17.26/sh. **(D)** In mill. **(E)** Rate base: AL, MS,

fair value; FL, GA, orig. cost. All'd return on com. eq. (blended): 12.5%; earn. on avg. com. eq., '16: 11.8%. Regul. Climate: GA, AL Above Avg.; MS, FL Avg. (F) Winter peak in '14 & '15. Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 100

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1/03; Illinois Power 10/04. Has 1.2 mill. electric and 127,000 gas customers in Missouri; 1.2 mill. electric and 813,000 gas customers in Illinois. Discontinued nonregulated power-generation operation in 13. Electric rev. breakdown: residential, 45%; commercial, 33%; in-

'16 reported deprec. rates: 3%-4%. Has 8,600 employees. Chairman, President & CEO: Warner L. Baxter. Inc.: MO. Address: One Ameren Plaza, 1901 Chouteau Ave., P.O. Box 66149, St. Louis, MO 63166-6149. Tel.: 314-621-3222. Internet: www.ameren.com.

Fixed Charge Cov. (%)		355	343	351
ANNUAL RATES	Past	Past	Est'd	'14-'16
of change (per sh)	10 Yrs.	5 Yrs.	to '	20-'22
Revenues	-2.0%	-4.0%	5 2	2.5%
"Cash Flow"	.5%			6.5%
Earnings	-1.5%	-1.5%		5.0%
Dividends	-4.0%	1.5%		1.5%
Book Value	-1.0%	-2.5%	5 4	1.0%

Annual Load Factor (%)
% Change Customers (vr-end)

Cal-	QUAR	TERLY RE	VENUES (\$ mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	1594	1419	1670	1370	6053.0
2015	1556	1401	1833	1308	6098.0
2016	1434	1427	1859	1356	6076.0
2017	1514	1538	1723	1425	6200
2018	1550	1600	1750	1450	6350
Cal-	EA	RNINGS F	ER SHARI	ΕA	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.40	.62	1.20	.19	2.40
2015	.45	.40	1.41	.12	2.38
2016	.43	.61	1.52	.13	2.68
2017	.42	.79	1.18	.36	2.75
2018	.55	.70	1.40	.40	3.05
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.40	.40	.40	.40	1.60
2014	.40	.40	.40	.41	1.61
2015	.41	.41	.41	.425	1.66
2016	.425	.425	.425	.44	1.72
2017	.44	.44	.44	.4575	

We expect Ameren's earnings to increase modestly in 2017. The company is benefiting from a \$92 million electric rate increase that took effect at the start of April. Forward-looking regulatory mechanisms for Ameren's electric business in Missouri and the company's federally regulated transmission business provide additional rate relief. On the other hand, thirdquarter income was reduced by a \$0.06-ashare noncash charge for the revaluation of deferred taxes following an income tax increase in Illinois. Our earnings estimate, which we trimmed by \$0.05 a share, is within Ameren's guidance (based on GAAP) of \$2.67-\$2.81 a share.

Several factors should produce a strong profit increase in 2018. Ameren won't have the aforementioned \$0.06-ashare tax-related charge. The utility will benefit from a full year of the tariff hike in Missouri. We assume normal weather patterns; unfavorable weather hurt the bottom line by \$0.06 a share in the first nine months of 2017. The Callaway nuclear plant will not have a refueling outage. And the refinancing of debt should be another plus. We have raised our earnings estimate by \$0.05 a share, to \$3.05.

Ameren has proposed a significant wind investment in Missouri. If approved by the state commission, this would result in about \$1 billion of capital spending to add at least 700 megawatts of capacity by the end of 2020.

The board of directors increased the dividend. The raise was \$0.07 a share (4.0%) annually, slightly better than we had estimated. Ameren is targeting a pay-

out ratio in a range of 55%-70%.

Ameren is awaiting a federal ruling regarding its allowed return on equity for electric transmission. The regulators have fielded multiple complaints from transmission customers who believe allowed ROEs for transmission are excessive. If a recommendation from an administrative law judge is enacted, this would reduce the allowed ROE for transmission from 10.82% to 10.2%

This timely stock has performed well in 2017. The price is up almost 20%. However, the dividend yield is now just 3%, and the recent price is above our 2020-2022 Target Price Range.

Paul E. Debbas, CFA December 15, 2017

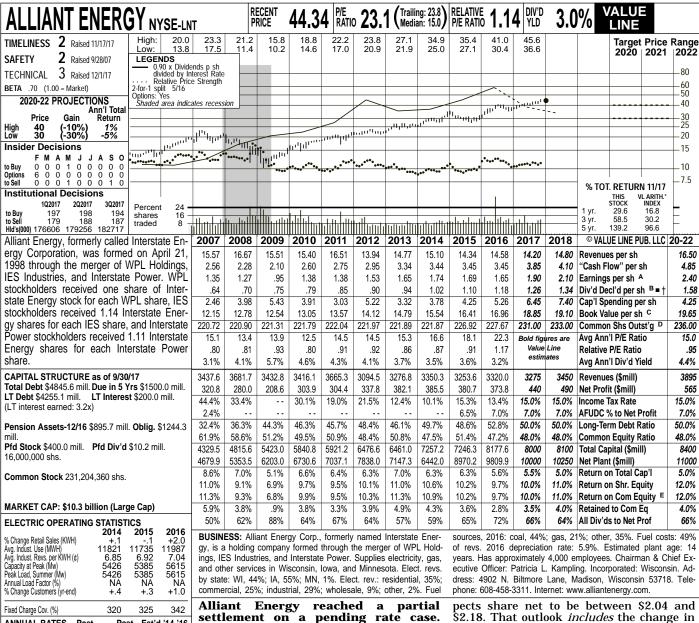
(A) Dil. EPS. Excl. nonrec. gain (losses): '05, (11¢); '10, (\$2.19); '11, (32¢); '12, (\$6.42); gain (loss) from disc. ops.: '13, (92¢); '15, 21¢. '14 & 16 EPS don't sum due to rounding. Next egs.

report due mid-Feb. **(B)** Div'ds histor. paid in late Mar., June, Sept., & Dec. ■ Div'd reinv. plan avail. **(C)** Incl. intang. In '16: \$7.62/sh. **(D)** In mill. **(E)** Rate base: Orig. cost depr. Rate

Company's Financial Strength Stock's Price Stability 95 Price Growth Persistence 40 **Earnings Predictability** 80

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ANNUAL RATES Est'd '14-'16 Past 10 Yrs. to '20-'22 5 Yrs. of change (per sh) 0.5% 3.5% 5.0% 7.5% -1.5% 6.5% 6.5% Revenues "Cash Flow" 4.0% 6.0% Earnings 6.0% 6.5% 4.5% 4.5% 4.0% Dividends **Book Value**

Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year		
2014	952.8	750.3	843.1	804.1	3350.3		
2015	897.4	717.2	898.9	740.1	3253.6		
2016	843.8	754.2	925.0	797.0	3320.0		
2017	853.9	765.3	906.9	748.9	3275		
2018	880	790	935	845	3450		
Cal-	EA	Full					
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year		
2014	.49	.28	.70	.27	1.74		
2015	.44	.30	.80	.15	1.69		
2016	.43	.37		.28	1.65		
2017	.44	.41	.73	.32	1.90		
2018	.46	.41	.88	.35	2.10		
Cal-	QUART	Full					
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year		
2013	.235	.235	.235	.235	.94		
2014	.255	.255	.255	.255	1.02		
2015	.275	.275	.275	.275	1.10		
2016	.295	.295	.295	.295	1.18		
2017	.315	.315	.315	.315			

Back in April, the company requested from the Iowa Utilities Board (IUB) a \$176 million (11.6%) tariff increase for its retail electric customers. A temporary rate hike for around half that amount went into effect earlier this year while the IUB reviewed the application. Though a final decision isn't expected until early 2018, the two sides appear to have reached a middle ground. Alliant has been granted a \$130 million (8.6%) increase based on a 10.0% return on a 49% common-equity ratio. The settlement also resulted in a modest (\$0.02 per share) nonrecurring charge in the third quarter from the writedown of certain regulatory assets.

The utility revised its 2017 outlook and released preliminary 2018 guidance. For the current year, Alliant expects share earnings to be between \$1.89 and \$1.97, down from its previous range of \$1.92-\$2.06. The difference in the midpoint (\$1.93 versus the prior \$1.99) was due to the negative impact of milder summer temperatures on electric and gas sales in the Midwest. For 2018, management exbase rates from the settlement with IUB. We now model full-year EPS of \$1.90 (down from \$2.00) and \$2.10 (down from \$2.12) for 2017 and 2018, respectively.

The company announced a new wind farm investment in Iowa. The 300megawatt project will power approximately 130,000 homes once completed. Alliant is aiming to generate at least one-third of its Iowa energy mix from wind starting in 2020, the year that this project is scheduled to come online.

We look for a dividend hike in early **January.** This has been the pattern in recent years. We estimate that the board will boost the quarterly payout by \$0.02 a share (6.3%), the same increase as in each of the past four years. Alliant is targeting a payout ratio in a range of 60%-70%.

This timely and good-quality stock

has a dividend yield that is well above the Value Line median. However, the recent price is so far above our 2020-2022 Target Price Range that 3- to 5-year total return potential is negative.

Daniel Henigson December 15, 2017

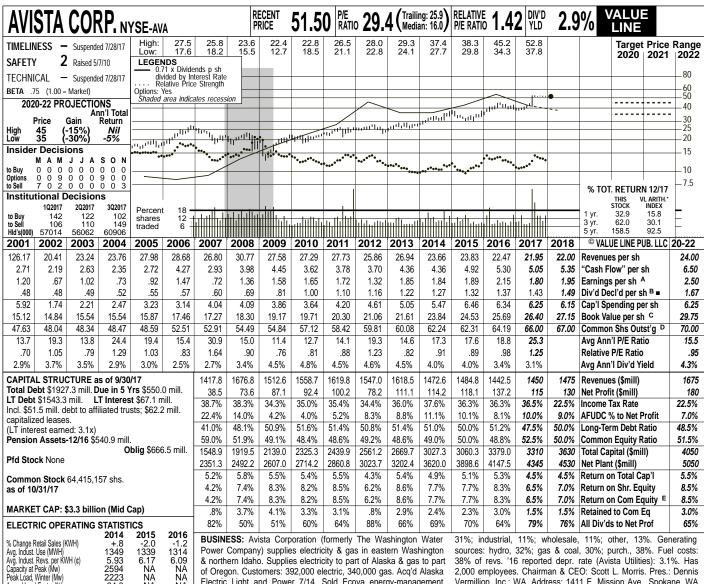
(A) Diluted EPS. Excl. nonrecur. gains (losses): '07, 55¢; '08, 4¢; '09, (44¢); '10, (8¢); '11, (1¢); '12, (8¢). Next earnings report due late February. (B) Dividends historically paid in mid-Feb.,

avail. † Shareholder invest. plan avail. (C) Incl. deferred chgs. In '16: \$22.6 mill., \$0.10/sh. (D) In millions, adjusted for split. (E) Rate base:

Aug., and Nov. Div'd reinvest. plan † Shareholder invest. plan avail. (C) Incl. 10.5%; in WI in '16 Regul. Clim.: WI, Above red chgs. In '16: \$22.6 mill., \$0.10/sh. (D) Avg.; IA, Avg.

Company's Financial Strength Stock's Price Stability Price Growth Persistence 100 90 **Earnings Predictability**

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Electric Light and Power 7/14. Sold Ecova energy-management sub. 6/14. Electric rev. breakdown: residential, 35%; commercial,

Vermillion. Inc.: WA. Address: 1411 E. Mission Ave., Spokane, WA 99202-2600. Tel.: 509-489-0500. Internet: www.avistacorp.com

322 315 333 Fixed Charge Cov. (% Past ANNUAL RATES Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 -3.5% 4.0% 3.5% 6.5% 4.5% Revenues -1.5% .5% 'Cash Flow' 4.5% 6.5% 5.0% 4.0% Earnings 9.5% 4.0% 4.0% 3.0% Dividends Book Value

+5.5

% Change Customers (vr-end)

NA

+1.3

NA

+.6

Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	446.6	312.6	301.6	411.8	1472.6
2015	446.5	337.3	313.7	387.3	1484.8
2016	418.2	318.8	303.4	402.1	1442.5
2017	436.5	314.5	297.1	401.9	1450
2018	425	325	310	415	1475
Cal-	EA	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.79	.43	.16	.48	1.84
2015	.74	.40	.21	.54	1.89
2016	.92	.43	.19	.62	2.15
2017	.96	.34	.07	.43	1.80
2018	.85	.40	.15	.55	1.95
Cal-	QUAR	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.3175	.3175	.3175	.3175	1.27
2015	.33	.33	.33	.33	1.32
2016	.3425	.3425	.3425	.3425	1.37
2017	.3575	.3575	.3575	.3575	1.43
2018					

Avista's shareholders have voted in favor of the takeover of the company. Hydro One, a Canadian company, has agreed to pay US\$53 in cash—a generous offer-for each share of Avista. The acquisition requires the approval of the regulatory commissions in Washington, Idaho, Oregon, Alaska, and Montana. The Federal Energy Regulatory Commission has approved it. Completion of the deal is likely in the fall of 2018.

We advise stockholders to sell their shares on the open market. The recent price is just 3% below the takeover price. Thus, there is not enough upside potential for most investors to assume the risk that the deal fails to win regulatory approval. Utility combinations always face regulatory uncertainty, and this one requires the approval of five more commissions. The Timeliness rank of Avista stock remains suspended due to the buyout agreement.

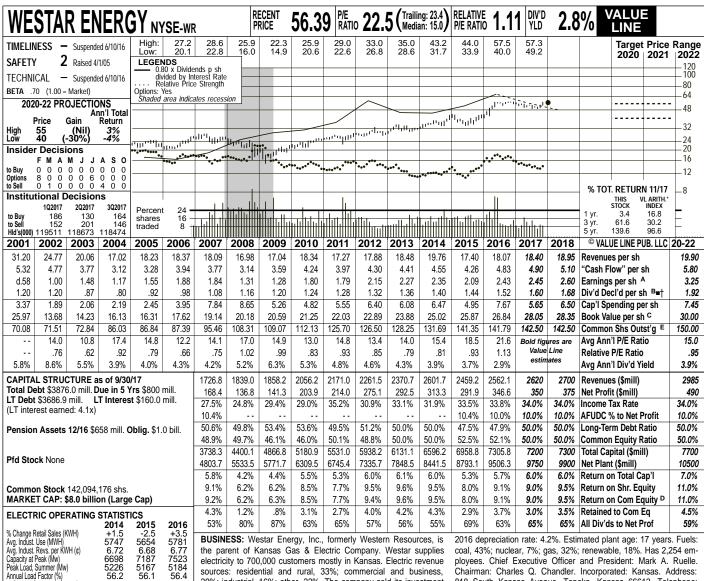
Avista has revised its rate case in Washington. The utility is seeking electric and gas tariff increases in 2018, 2019. and 2020 (effective on May 1st each year). The electric requests are \$54.4 million, \$13.5 million, and \$13.9 million, and the gas requests are \$6.6 million, \$3.7 million, and \$3.8 million. These amounts are below the original ones due to changes in the timing of capital projects. The company based its filing on a return of 9.9% on a common-equity ratio of 50%. Note, however, that recent rate applications in Washington have not gone well for Avista. In fact, a lack of rate relief in the state last year was a key reason why earnings almost certainly declined significantly in 2017. Our estimate also reflects mergerrelated expenses, which Avista pegs at \$0.20-\$0.25 a share.

Rate settlements were approved in Idaho and Alaska. In Idaho, electric and gas tariffs rose \$12.9 million and \$1.2 million, respectively, at the start of 2018, and will increase another \$4.5 million and \$1.1 million, respectively, at the start of 2019. The order was based on a return of 9.5% on a common-equity ratio of 50%. In Alaska, final rates were raised by \$1.3 million (the same amount as the interim hike that took effect on November 23, 2016). The allowed ROE and common-equity ratio are 11.95% and 58.2%, respectively. Paul E. Debbas, CFA January 26, 2018

(A) Dil. EPS. Excl. nonrec. gain (losses): '02, | rounding or change in shs. Next earnings re- (9¢); '03, (3¢); '14, 9¢; gains (losses) on disc. ops.: '01, (\$1.00); '02, 2¢; '03, (10¢); '14, | June, Sept. & Dec. ■ Div'd reinv. avail. (C) Incl. | in OR in '15: 9.5%; earn. on avg. com. eq., '16: \$1.17; '15, 8¢. '14 & '16 EPS don't sum due to | def'd chgs. In '16: \$11.33/sh. (D) In mill. | 8.6%. Regul. Clim.: WA, Avg.; ID, Above Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Company's Financial Strength Stock's Price Stability 85 Price Growth Persistence 60 **Earnings Predictability** 75

Exhibit 9



sources: residential and rural, 33%; commercial and business, 29%; industrial, 16%; other, 22%. The company sold its investment in ONEOK in 2003 and 85% ownership in Protection One in 2004.

Chairman: Charles Q. Chandler. Incorporated: Kansas. Address: 818 South Kansas Avenue, Topeka, Kansas 66612. Telephone: 785-575-6300. Internet: www.westarenergy.com

335 Fixed Charge Cov. (%) 332 330 ANNUAL RATES Past Past Est'd '14-'16 10 Yrs. 5 Yrs. to '20-'22 of change (per sh) 1.0% 3.0% 7.0% 3.0% 4.0% 0.5% 3.0% 4.0% 2.5% 4.5% Revenues 'Cash Flow" Earnings Dividends 6.0% 5.0% 4.5% **Book Value**

% Change Customers (yr-end)

Cal- endar	QUAR Mar.31		VENUES (Full Year
2014	628.6	612.7		596.4	2601.7
2014	590.8	—			2459.2
2015	569.5			606.5	2562.1
2010	572.6	609.3		643.8	2620
2017	600	635	800		2700
2010				665	2700
Cal-			ER SHARI	_	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.52	.40	1.10	.33	2.35
2015	.38	.46	.97	.28	2.09
2016	.46	.51	1.08	.38	2.43
2017	.42	.50	1.11	.42	2.45
2018	.46	.52	1.19	.43	2.60
Cal-	QUAR1	TERLY DIV	IDENDS PA	\ID B = †	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.33	.34	.34	.34	1.35
2014	.34	.35	.35	.35	1.39
2015	.35	.36	.36	.36	1.43
2016	.38	.38	.38	.38	1.52
2017	.40	.40	.40	.40	
	"				

The proposed merger of equals between Westar Energy and Great Plains Energy has taken some steps forward. Under the terms of the agreement, no premium would be paid and no cash would be exchanged with respect to either entity. A holding company would be created in which Westar stockholders receive one share for each of their current shares, and Great Plains stockholders receive 0.5981 shares for each share that they own. The tax-free transaction was recently approved by each company's stockholders and is expected to close by mid-2018, pending regulatory approval and other customary closing conditions.

We advise investors to hold their shares. The combined entity is targeting average annual earnings and dividend growth of 6%-8%. The companies also expect to save \$550 million in the first five years upon completion of the deal, and \$140 million to \$170 million annually thereafter. If the transaction fails to win regulatory approval (unlikely in our view), Westar would receive a \$190 million cash termination fee from GXP.

The pending merger is having a slight

impact on earnings. Thus far in 2017, Westar has incurred \$9 million in legal and operating expenses associated with the deal (slightly less than what we had been modeling). It expects that figure to climb to \$45 million by the time the transaction closes in mid-2018. Note that we have included this in our earnings presentation. For full-year 2017 and 2018, our share-net projections remain unchanged at \$2.45 and \$2.60, respectively.

The new company expects to set its initial dividend at a level that maintains the current payout for GXP **shareholders.** This would mean an increase of about 15% for WR stockholders.

Management provided an update on some of the other regulatory proceedings. Westar expects to file a general rate case for its main utility subsidiary in the first quarter of 2018, rather than at the end of this year. We think it will ask for an increase of 6%-10%. The company also plans to submit new wind farm proposals to KCC regulators in the coming months.

This issue's Timeliness rank remains suspended due to the pending merger. Daniel Henigson December 15, 2017

(A) EPS diluted from 2010 onward. Excl. nonrecur. gains (losses): '01, 27¢; '02, (\$12.06); '03, 77¢; '08, 39¢; '11, 14¢. Earnings may not sum due to rounding. Next earnings report due | invest. plan avail. (C) Incl. reg. assets. In 2016: | Clim.: Avg. (E) In mill.

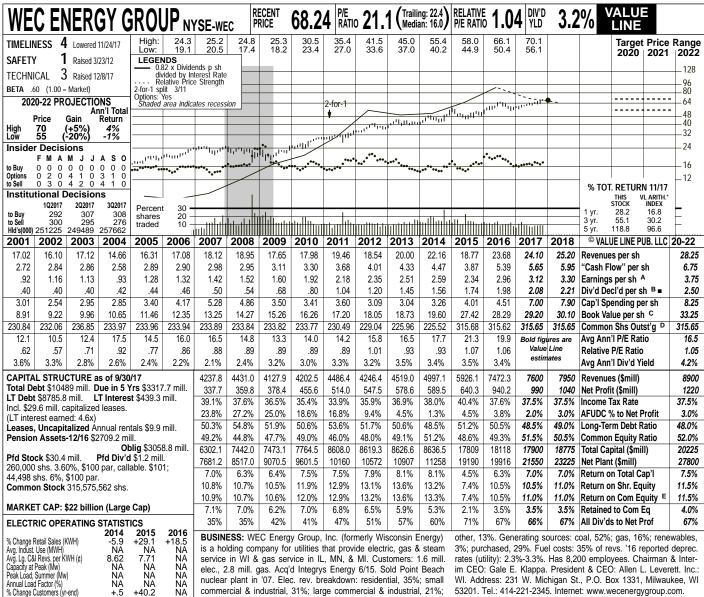
mid-February.

(B) Div'ds paid in early Jan., April, July, and Oct. ■ Div'd reinvest. plan avail. † Shareholder earned on avg. com. eq., '16: 9.0%. Regul.

Company's Financial Strength Stock's Price Stability 95 Price Growth Persistence 75 **Earnings Predictability** 90

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elec., 2.8 mill. gas. Acq'd Integrys Energy 6/15. Sold Point Beach nuclear plant in '07. Elec. rev. breakdown: residential, 35%; small commercial & industrial, 31%; large commercial & industrial, 21%;

im CEO: Gale E. Klappa. President & CEO: Allen L. Leverett. Inc.: WI. Address: 231 W. Michigan St., P.O. Box 1331, Milwaukee, WI 53201. Tel.: 414-221-2345. Internet: www.wecenergygroup.com

	454	364	404
Past	Past	Est'd	'14-'16
10 Yrs.	5 Yrs.	to '	20-'22
3.0%	3.0%	5 4	1.5%
5.0%	6.5%	6	6.5%
8.5%			6.0%
			5.5%
8.0%	9.0%	5 5	5.0%
	10 Yrs. 3.0% 5.0%	Past 10 Yrs. 5 Yrs. 3.0% 5.0% 6.5% 8.5% 6.5% 15.0% 16.0%	Past Past Est'd 10 Yrs. 5 Yrs. to ''. 3.0% 3.0% 4. 5.0% 6.5% 6.5% 6.5% 6.5% 6.5% 6.5% 6.5% 6.5

Annual Load Factor (%)
% Change Customers (vr-end)

NA

NA

+40.2

			,		,
Cal- endar	QUAR Mar.31		VENUES (Sep.30		Full Year
2014	1695	1044	1033	1225	4997.1
2015	1388	991	1699	1848	5926.1
2016	2195	1602	1712	1963	7472.3
2017	2304	1632	1657	2007	7600
2018	2400	1700	1750	2100	7950
Cal-	E/	RNINGS P	ER SHARI	ΕA	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.91	.58	.56	.53	2.59
2015	.86	.35	.58	.57	2.34
2016	1.09	.57	.68	.61	2.96
2017	1.12	.63	.68	.69	3.12
2018	1.20	.67	.73	.70	3.30
Cal-	QUAR'	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.34	.34	.3825	.3825	1.45
2014	.39	.39	.39	.39	1.56
2015	.4225	.4225	.44	.4575	1.74
2016	.495	.495	.495	.495	1.98
2017	.52	.52	.52	.52	

We estimate that WEC Energy Group will post solid earnings increases for **2017 and 2018.** The company is benefiting from cost reductions and rate relief its utilities obtain through various regulatory mechanisms. Most notably, Peoples Gas in Chicago has current recovery of the capital it spends on its accelerated main replacement program. This will likely wind up at about \$300 million this year and \$280 million-\$300 million annually through 2023. Our 2017 earnings estimate is at the upper end of the company's guidance of \$3.06-\$3.12 a share, and we forecast 6% growth in 2018. WEC Energy's targeted range for earnings growth is 5%-7% annually.

Shareholders can look forward to a healthy dividend hike in the first quarter of 2018. WEC Energy announced that it plans to raise the annual disbursement by \$0.13 a share (6.25%), subject to action by the directors. The company's goals for the dividend are 5%-7% yearly growth and a 65%-70% payout ratio.

A gas rate case is pending in Minne**sota.** The utility filed for a rate hike of \$12.6 million (5.0%), based on a 10.3% return on equity. An interim increase of \$9.6 million will take effect at the start of 2018. A final order isn't expected until the first quarter of 2019.

Otherwise, things are quiet on the regulatory front. As mentioned, the company's utilities are benefiting from regulatory mechanisms and cost reductions. and they should continue to earn their allowed ROEs (or come close). They ought to effect additional expense reductions in the next few years as old coal-fired units are retired.

The company is building a gas-fired plant in Michigan. The 180-megawatt facility is expected to be completed in 2019 at a cost of \$277 million. The utility will recover half of its investment in retail rates and the other half through a 20-year contract with a large industrial customer. We do not recommend this stock, for now. It is ranked unfavorably for Timeli-

ness, and the dividend yield is only average for a utility. Total return potential to 2020-2022 is minuscule because the recent quotation is near the upper end of our 3to 5-year Target Price Range. Paul E. Debbas, CFA December 15, 2017

(A) Diluted EPS. Excl. gains on disc. ops.: '04, 77¢; '05, 2¢; '06, 2¢; '09, 2¢; '10, 1¢; '11, 6¢. '14-'16 EPS don't sum due to rounding of chng. in shs. Next egs. report due early Feb.

(B) Div'ds paid in early Mar., June, Sept. & Dec. = Div'd reinv. avail. (C) Incl. intang. In '16: 9.11%; in MI in '16: 9.9%; earned on \$19.44/sh. (D) In mill., adj. for split. (E) Rate wy. Com. eq., '16: 10.6%. Regul. Climate: WI, base: Net orig. cost. Rates all'd on com. eq. in Above Avg.; IL, Below Avg.; MN & MI, Avg.

Company's Financial Strength Stock's Price Stability A+ 95 Price Growth Persistence 80 **Earnings Predictability** 85

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ELECTRIC UTILITY (EAST) INDUSTRY

All of the major electric utilities located in the eastern region of the United States are reviewed in this Issue; western electrics, in Issue 11; and the remaining utilities, in Issue 5.

We discuss how tax reform will affect companies in the Electric Utility Industry.

Several companies covered in Issue 1 have involvement with nuclear power. Two have worries stemming from nuclear construction, and a few have nonregulated assets that are threatened by unfavorable market conditions.

Most electric utility stocks have retreated in price so far in 2018. However, they are still expensive, by historical standards.

The New Federal Tax Law

A new federal tax law took effect at the start of 2018. For regulated utilities, it is highly likely that all of the benefits of a lower tax rate will be passed through to customers. The only questions are when, and how? However, although a one-for-one pass-through will not affect reported profits, this will reduce a utility's cash flow. That's because it will receive less cash from its customers, but its cash outlays for taxes won't decline correspondingly because utilities' tax liabilities aren't entirely in cash. Some companies are paying no cash taxes at all. In addition, as a trade-off for retaining full tax deductibility for interest payments on utility-issued debt, utilities are no longer eligible for bonus depreciation, which was a boon for cash flow. (In some cases, interest payments on debt issued at the parent level will be only partially deductible.) The absence of bonus depreciation will have a positive effect on a utility's rate-base growth, because deferred taxes that are subtracted from the rate base will be lower than they otherwise would have been. This should benefit longterm earnings growth. However, due to the negative effects on cash flow, the credit-rating agencies have placed a negative outlook on some electric companies' creditworthiness.

Of course, not every company covered in the Electric Utility Industry is entirely regulated. *NextEra Energy* and *Dominion Energy*, which each have significant non-utility operations, have stated that the lower federal tax rate will boost earnings in 2018. Nonregulated entities are not expected to pass the tax savings onto their customers.

The decline in federal tax rates meant that companies had to revalue their deferred tax balances. For *NextEra Energy* and *Dominion Energy*, this resulted in noncash credits that led to profits that were significantly higher than normal in the fourth quarter of 2017. We are *including* these credits or charges in our earnings presentation.

Nuclear Worries

Georgia Power (a subsidiary of *Southern Company*) and South Carolina Electric & Gas (a subsidiary of *SCANA*) each have electric utility subsidiaries with nuclear construction projects that experienced significant delays and cost overruns. However, the future of each project is very much different. Georgia Power has received permission from the state commission to continue construction, despite the problems. The project

INDUSTRY TIMELINESS: 88 (of 97)

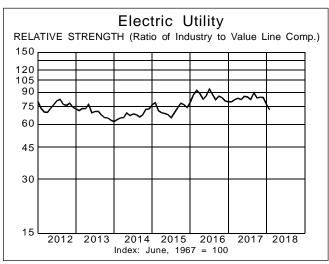
will be a bit less lucrative than it would have been had it been completed on time and on budget, though, and the utility is still assuming construction risk. By contrast, SCE&G canceled its project, and the state legislature does not want the utility to continue to collect money from customers for the unsuccessful project. (The company believes the state's Base Load Review Act allows it to continue collecting these monies.) *Dominion Energy* agreed to take over *SCANA*, as long as there is no unfavorable regulatory or legislative changes. With the price of *SCANA* stock well below the value of *Dominion Energy*'s offer, the market is skeptical that the deal will be completed.

Other companies reviewed in Issue 1 have a different concern: the lack of profitability of their nonregulated nuclear plants. A combination of low gas prices, subsidized renewable energy, and weak demand for power has hurt these assets. Utilities believe current market prices don't recognize the benefits of nuclear generation (fuel diversity and no carbon emissions). So, some companies are seeking subsidies from the states in which their nuclear units are based, similar to the "zero emissions credits" that were granted by the Illinois legislature and the New York regulators for plants owned by *Exelon*. However, this company still has a unit in Pennsylvania that is threatened with a premature closing, and its facility in New Jersey will be shut in 2018, a year ahead of schedule. Some companies are still seeking some kind of subsidy that would allow them to keep their troubled nuclear plants open: FirstEnergy in Ohio, Public Service Enterprise Group in New Jersey, and Dominion Energy in Connecticut.

Conclusion

After the stellar performance of most stocks in the Electric Utility Industry in 2017, share prices of most electric companies declined in the first few weeks of 2018. In our view, this is partly due to reversion to the mean, and partly due to investors' increased concern about the likelihood of a few interest-rate increases by the Federal Reserve this year. The average dividend yield for this industry is up to 3.6%. This is above the level seen in 2017, but is still low, by historical standards. Moreover, many of these equities continue to trade within their 3- to 5-year Target Price Range.

Paul E. Debbas, CFA



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All of the major electric utilities located in the central region of the United States are reviewed in this Issue; eastern electrics, in Issue 1; and the remaining utilities, in Issue 11.

Electric companies have been disseminating their new long-term capital spending plans. In many cases, the capital budgets are increasing. We discuss where these monies are going.

We provide an update of merger and acquisition activity in the Electric Utility Industry.

Most equities in this industry have performed extremely well in 2017. The stocks are expensively priced.

Rising Capital Budgets

At the Edison Electric Institute Financial Conference, held annually in November, many electric companies unveil their long-term (typically three or five years) capital spending plans. For many utilities, the budget for the period beginning in 2018 is higher than the one for the period that began in 2017. This doesn't necessarily mean that capital spending in 2018 will be greater than the 2017 figure, only that the expenditures over the multiyear period will probably exceed those of the previous period.

Where is this spending targeted? This depends on the company. Electric transmission is a key area of investment for Fortis (the parent company of ITC Holdings, a transmission-only utility in the upper Midwest), American Electric Power, Ameren, and ALLETE. Several companies are adding wind or solar projects to meet their states' renewable-energy requirements. CMS Energy is replacing old equipment, some of which dates back before 1970. WEC Energy Group is replacing gas mains at its utility that serves Chicago. Vectren is modernizing its electric system. *Entergy* plans to install an advanced metering infrastructure and is building gas-fired power plants to meet the rising demand for electricity in its service area. (By contrast, many utilities are seeing little or no load growth due to energy efficiency measures and the slow recovery from the severe 2007-2009 recession.) And *OGE Energy* is spending money for environmental compliance.

How will the utilities fund these projects? To the extent that internal cash flow is insufficient, most will rely on debt financing. Low interest rates make this kind of financing attractive. Some companies, such as *Ameren*, expect to avoid equity issuances of any kind. *Fortis* intends to limit its equity needs to stock that is issued through its dividend reinvestment and other stock plans. *CMS Energy* will raise some stock in this way as well, but will also benefit from the use of tax-loss carryforwards. *DTE Energy* and *Vectren* will need to issue some equity, however.

This capital spending will expand the utilities' rate base, and thus, boost their earning power. The utility subsidiaries of *American Electric Power*, *CMS Energy*, and *DTE Energy* will have frequent rate cases to earn a return on its capital expenditures. Companies recover their transmission investment through forward-looking formula rate plans. *Entergy* and *CenterPoint Energy*

INDUSTRY TIMELINESS: 63 (of 97)

have formula rate plans that cover other kinds of spending in most of their jurisdictions. The aforementioned gas main replacement by *WEC Energy*'s Chicago utility is being recovered through monthly surcharges on customers' bills.

Merger And Acquisition Update

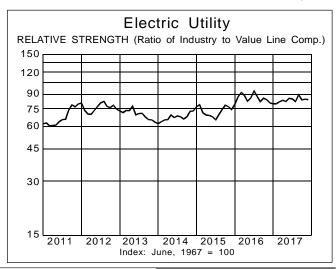
The roster of companies in the Electric Utility Industry has shrunk in recent years thanks to mergers and acquisitions. Pending deals that await regulatory approval include the combination of *Great Plains Energy* and *Westar Energy* and the takeover of Avista (covered in Issue 11). This year, the share prices of several other utilities have risen sharply due to takeover speculation. This includes *Vectren*. We advise against buying a stock solely because of takeover speculation, however. Even if a deal is reached, obtaining regulatory approval is often difficult. Many proposed transactions in this industry have fallen through, including the first deal between *Great Plains* and *Westar*. The companies reworked their agreement to make it (presumably) amenable to the regulators.

Conclusion

In 2017, most electric utility equities have risen sharply in price. Those that have advanced at a mere single-digit pace are the exception, not the rule. There are some exceptions. SCANA (covered in Issue 1) has plummeted due to the severe problems with its utility's nuclear construction project, which was canceled. The equities of two California companies, PG&E Corp. and Edison International (covered in Issue 11), have been weak due to the market's worries about liability for wildfires in the Golden State this year. Otherwise, steep price increases have been the norm. Takeover speculation has buoyed some stocks, and investors continue to reach for yield in a low interest-rate environment.

The average dividend yield of stocks in the Electric Utility Industry is just 3.3%. Seeing yields below 3% is no longer unusual, and one equity, *MGE Energy*, has a yield of just 2%. Seeing a recent quotation above the upper end of our 2020-2022 Target Price Range is also no longer unusual. Although many of these stocks might well continue to perform well in the near term, we advise long-term investors to exercise caution here.

Paul E. Debbas, CFA



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ELECTRIC UTILITY (WEST) INDUSTRY

All of the major electric utilities located in the western region of the United States are reviewed in this Issue; eastern electrics, in Issue 1; and the remaining utilities, in Issue 5.

We look back at 2017 and look forward to 2018. The new year has brought changes in federal tax laws.

The potentially high liability for wildfires is concerning to electric utilities in California.

After a strong showing last year, electric utility equities have given back some of their gains in early 2018. However, they have hardly become cheap.

A Look Back At 2017 And A Look Ahead To 2018

The year that just ended was a good one for the Electric Utility Industry as a whole. The prices of most stocks didn't just rise, they rose more than 10%. Investors continued to "reach for yield" in an environment of low interest rates. Merger and acquisition activity (and speculation) also sent share prices higher. Among the standout performers were *Avista*, which rose 29% because the company agreed to be acquired. Two utilities covered in Issue 1, AVANGRID and NextEra Energy, advanced over 30%. For the former company, we attribute this to takeover speculation; for the latter, simply a strong performance.

On the other hand, the prices of a few electric utility equities fell sharply last year. *PG&E Corporation* and *Edison International* were hurt by the market's worries about possibly huge liabilities resulting from wildfires in California in 2017. (We discuss this matter in the next section.) SCANA (reviewed in Issue 1) lost 46% of its value due to the cancelation of its nuclear construction project, which faced significant delays and cost overruns. These were the exceptions to the rule.

Ironically, in early 2018 SCANA stock was the top performer in the industry. The company agreed to a takeover by Dominion Energy (also covered in Issue 1). Otherwise, the new year has seen declines in most issues. We suspect some investors are locking in profits. Perhaps the expectation of rate hikes by the Federal Reserve is also weighing on stock prices in this industry.

This year might well see additional merger and acquisition activity. Besides the deals mentioned above, the proposed combination of Great Plains Energy and Westar Energy (reviewed in Issue 5) is expected to be completed in 2018.

Changes in federal tax laws require a discussion. Most companies are still evaluating the effects of the new law, and might not make any public statements about it until they release fourth-quarter earnings in February (for most companies). For the regulated utility business, whatever benefits the companies receive from lower taxes will be passed through to customers—the only real question is how, and over which time frame. However, some utilities have nonutility siblings under the umbrella of their parent companies, and these should benefit from tax reform. Hawaiian Electric Industries, with its American Savings Bank subsidiary, is an example. Another consideration is the deferred tax assets

INDUSTRY TIMELINESS: 3 (of 97)

and liabilities on companies' balance sheets. For those that did not arise from the regulated operations, there will be one-time, noncash gains or losses for the fourth quarter of 2017. We will *include* these in our earnings presentation. So far, CenterPoint Energy (covered in Issue 5) and AVANGRID (covered in Issue 1) have stated that this will be positive, but *Sempra Energy* and *Xcel Energy* will take charges against December-period results. *Sempra* also expects some negative effects associated with its foreign operations.

Wildfires In California

In 2017, wildfires in California affected the service areas of the utilities owned by PG&E Corporation and Edison International. The causes of the fires have not yet been determined, but the market is worried that the utilities will be found liable due to the effects their power lines might have had on the wildfires. Under the state's inverse condemnation law, this may occur even if the company complied with established inspection and safety rules. The possibly huge liability prompted the board of directors of PG&E to suspend common and preferred dividends. (By contrast, the board of Edison *International* raised the disbursement.) Changes to these laws might come, but at this point, no bills to address this problem have been introduced in the California legislature. And even if the law is changed, there is no assurance that this will apply to the wildfires of last year.

Another question is whether utilities will be allowed to pass costs of restoration and repair through to customers. Last year, the California regulators ruled that San Diego Gas & Electric (a subsidiary of *Sempra*) may not do so in connection with a 2007 wildfire. This forced the company to write off a regulatory asset in the third quarter of 2017.

Conclusion

Although electric utility equities have not performed well so far in 2018, their valuations are still high, by historical standards. The average dividend yield of stocks in this industry is 3.6%. Moreover, many of these issues are still trading within their 2020-2022 Target Price Range. Accordingly, the group's average annual total return potential over that time frame is just 4%.

Paul E. Debbas, CFA

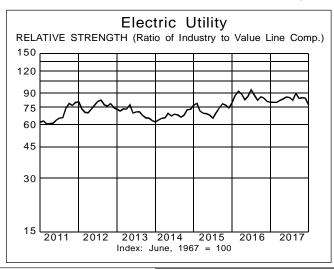
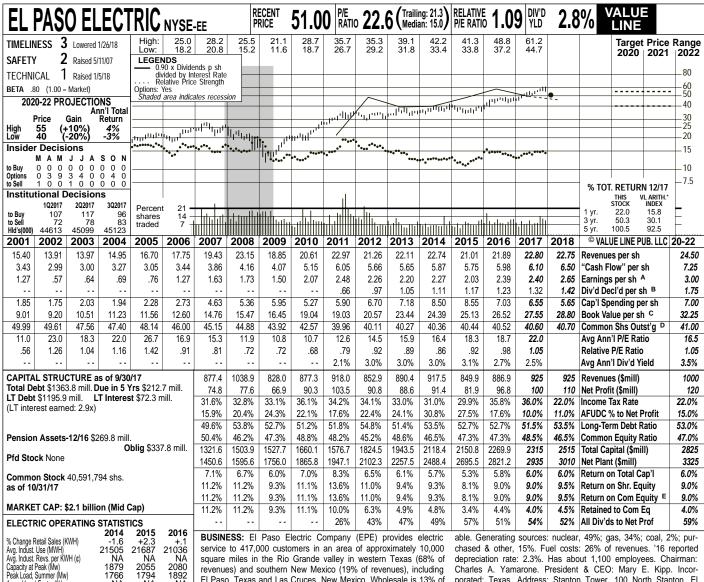


Exhibit 9



revenues) and southern New Mexico (19% of revenues), including El Paso, Texas and Las Cruces, New Mexico. Wholesale is 13% of revenues. Electric revenue breakdown by customer class not avail-

Charles A. Yamarone. President & CEO: Mary E. Kipp. Incorporated: Texas. Address: Stanton Tower, 100 North Stanton, El Paso, TX 79901. Tel.: 915-543-5711. Internet: www.epelectric.com.

251 218 267 Fixed Charge Cov. (%) **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) to '20-'22 1.0% 3.0% 2.0% Revenues 3.0% 2.0% 3.5% 5.0% 7.0% 4.0% 'Cash Flow' 6.0% 9.5% Earnings Dividends Book Value 8.0% 7.0%

+1.3

% Change Customers (vr-end)

ÑΑ

+1.4

+1.6

Cal- endar	QUAR Mar.31		VENUES (Full Year
2014	185.5	251.8	283.6	196.6	917.5
2015	163.8	219.5	289.7	176.9	849.9
2016	157.8	217.9	323.2	188.0	886.9
2017	171.3	251.8	297.5	204.4	925
2018	170	255	305	195	925
Cal-	EA	RNINGS P	ER SHARI	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.11	.75	1.30	.11	2.27
2015	.09	.52	1.40	.02	2.03
2016	d.14	.55	1.84	.14	2.39
2017	d.10	.89	1.47	.14	2.40
2018	d.10	.75	1.80	.20	2.65
Cal-	QUAR	TERLY DI	VIDENDS F	PAID B	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.265	.28	.28	.28	1.11
2015	.28	.295	.295	.295	1.17
2016	.295	.31	.31	.31	1.23
2017	.31	.335	.335	.335	
2010	i				

The Public Utility Commission of Texas has approved a regulatory settlement of El Paso Electric Compa**ny's rate case.** The utility's base tariffs were raised by \$14.5 million, based on a return of 9.65% on a common-equity ratio of 48.35%. New tariffs were retroactive to July 18, 2017. This enabled Units 3 and 4 of a gas-fired generating plant to be placed in the rate base. In addition, starting next year EPE will be able to file for recovery of higher transmission and distribution costs through a yearly regulatory mechanism, in stead of having to recoup these through a general rate application.

The utility has not yet filed for re-covery of Units 3 and 4 in New Mexico. EPE is not required to file an application in the state until July of 2019. The regulatory climate there is difficult, and the company's last rate order there (in July of 2016) was disappointing. The regulators might wind up calling in utilities as a result of the new federal tax law. Note, though, that the majority of EPE's business is in Texas, not New Mexico.

Earnings should increase in 2018 after a flattish showing in 2017. Our 2017

profit estimate is at the midpoint of the company's guidance of \$2.30-\$2.50 a share. In 2018, EPE will benefit from a full year's effect of the rate hike in Texas. In addition, the vibrant economy in the El Paso is stimulating strong customer growth. Several economic development projects have been completed or are under construction, such as a minor league baseball stadium and some medical facilities. For the 12-month period that ended on September 30th, the customer count rose 1.8%. This is well above average for the industry.

Finances are sound. The fixed-charge coverage, common-equity ratio, and earned returns on equity are within the norms for the electric utility industry. EPE's Financial Strength rating is B++

This stock has a dividend yield that is low for a utility. The yield is roughly three quarters of a percentage point below the industry average. With the recent quotation well within our 3- to 5-year Target Price Range, total return potential over that time frame is negligible, despite EPE's good prospects for dividend growth. Paul E. Debbas, CFA January 26, 201 January 26, 2018

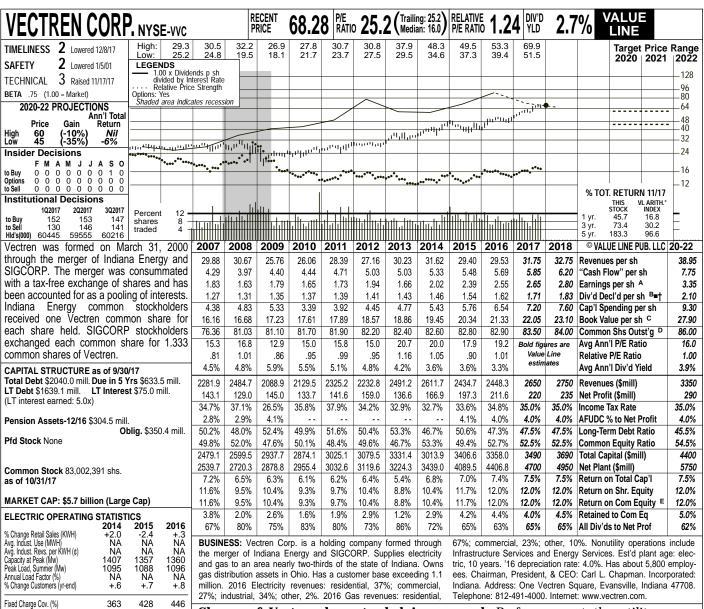
(A) Diluted earnings. Excl. nonrecurring gains (losses): '01, (4¢); '03, 81¢; '04, 4¢; '05, (2¢); '06, 13¢; '10, 24¢. '14 earnings don't sum to full-year total due to rounding. Next earnings © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

report due late Feb. (B) Initial dividend declared 4/11; payment dates in late March, June, Sept., and Dec. (C) Incl. deferred charges. In '16: \$118.9 mill., \$2.93/sh. (D) In Climate: TX, Average; NM, Below Average.

Company's Financial Strength Stock's Price Stability B++ 90 Price Growth Persistence 70 **Earnings Predictability** 75

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Exhibit 9



Past ANNUAL RATES Past Est'd '14-'16 10 Yrs 5 Yrs to '20-'22 of change (per sh) 2.5% 4.0% 6.0% 4.5% 6.0% 6.5% Revenues 2.0% 4.5% 4.0% Cash Flow Earnings 5.5% 5.5% Dividends Book Value 2.5% 3.0% 3.0%

Cal- endar			VENUES (\$ Sep. 30		Full Year
2014	796.8	542.5	595.6	676.8	2611.7
2015	706.2	551.0	573.5	604.0	2434.7
2016	584.8	533.7	631.0	699.0	2448.3
2017	624.5	630.7	691.2	703.6	2650
2018	655	655	710	730	2750
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year
2014	.62	.14	.57	.69	2.02
2015	.69	.43	.48	.79	2.39
2016	.58	.39	.74	.84	2.55
2017	.67	.45		.78	2.65
2018	.70	.48	.76	.86	2.80
Cal-	QUART	ERLY DIV	IDENDS PA	\ID B∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.355	.355	.355	.360	1.43
2014	.360	.360	.360	.380	1.46
2015	.380	.380	.380	.400	1.54
2016	.400	.400	.400	.420	1.62
2017	.420	.420	.420	.450	

Shares of Vectren have traded in a fairly narrow range over the past three months. This has followed a nice rally that began in late 2016. The company reported solid top-line growth for the September period. Performance at the nonutility group benefited from strong results at the infrastructure services operation, reflecting large pipeline projects this year. But the utility group fared less well, owing to a decline in usage from a large electric customer that completed its transition to a co-generation facility and lower electric margins. Moreover, growth in total operating expenses outstripped that of revenue, and share net advanced just modestly, to \$0.75. Looking forward, we expect solid performance will continue in the fourth quarter, but earnings per share will probably not match the impressive figure generated in the year-ago period.

The board of directors has raised the

dividend by 7%. Starting with the December payout, the quarterly dividend is now \$0.45 per share. Healthy dividend growth will probably continue.

Revenues and earnings should increase at a good pace from 2018 on-

ward. Performance at the utility group ought to be supported by investment in gas infrastructure programs in both Indiana and Ohio. Meanwhile, the nonutility group should further benefit from healthy demand for distribution services, as gas utilities continue to make significant investments in their infrastructure systems. The transmission business will likely be able to capitalize on high demand due to the need to replace aging infrastructure, though we do expect a measure of unevenness here going forward.

Short-term traders may want to take a closer look. This issue is well ranked for Timeliness. Moreover, Vectren earns good marks for Safety, Financial Strength, Price Stability, and Earnings Predictability. Volatility is subdued, as well.

But patient investors can probably find more-suitable choices elsewhere. The stock presently trades at a price-toearnings multiple that is well in excess of its historical average. As a result, this equity lacks long-term appreciation potential at this time. Also, the dividend yield does not stand out for a utility.

Michael Napoli, CFA December 15, 2017

(A) Diluted EPS. Excl. nonrecur. gain (loss): '09, 15¢. Next egs report due late February.

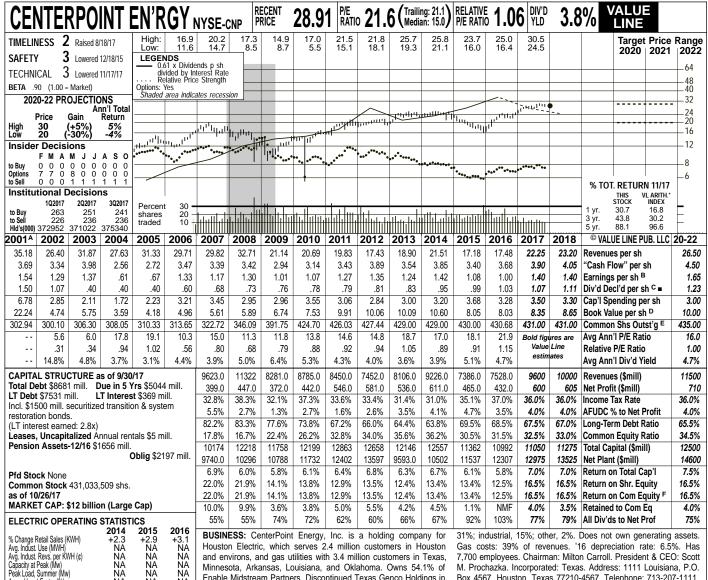
(B) Div'ds historically paid in early March, June, September, and December. ■Div'd rein-

plan avail. † Shareholder invest. plan fair value. Rates allowed on elect. common

equity range from 10.15% to 10.4%. Reguavail. (C) Incl. intang. In '16, \$7.27/sh. (D) In latory Climate: Above Average. (F) Totals may millions. (E) Electric rate base determination: not sum due to rounding.

Company's Financial Strength Stock's Price Stability Price Growth Persistence 90 70 Earnings Predictability

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and environs, and gas utilities with 3.4 million customers in Texas, Minnesota, Arkansas, Louisiana, and Oklahoma. Owns 54.1% of Enable Midstream Partners, Discontinued Texas Genco Holdings in '04. Electric revenue breakdown: residential, 52%; commercial,

7,700 employees. Chairman: Milton Carroll. President & CEO: Scott M. Prochazka. Incorporated: Texas. Address: 1111 Louisiana, P.O. Box 4567, Houston, Texas 77210-4567. Telephone: 713-207-1111. Internet: www.centerpointenergy.com.

200 219 194 Fixed Charge Cov. (%) **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 -4.5% 2.5% 3.0% -2.0% 3.0% 1.0% Revenues 6.0% 'Cash Flow" 3.5% 6.0% Earnings Dividends Book Value 5.0% 2.0% 3.5% 2.0%

% Change Customers (avg.)

NA

NA +2.4

NA NA

NA

+2.1

NA NA

+2.3

Cal- endar			VENUES (Sep. 30		Full Year
2014	3163	1884	1807	2372	9226.0
2015	2433	1532	1630	1791	7386.0
2016	1984	1574	1889	2081	7528.0
2017	2735	2143	2098	2624	9600
2018	2900	2150	2150	2800	10000
Cal-	EA	RNINGS P	ER SHARE	В	Full
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year
2014	.43	.25	.33	.41	1.42
2015	.30	.18	.34	.26	1.08
2016	.36	d.01	.41	.23	1.00
2017	.44	.31	.39	.26	1.40
2018	.39	.30	.43	.28	1.40
Cal-	QUAR'	TERLY DIV	IDENDS P	AID c ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2013	.2075	.2075	.2075	.2075	.83
2014	.2375	.2375	.2375	.2375	.95
2015	.2475	.2475	.2475	.2475	.99
2016	.2575	.2575	.2575	.2575	1.03
2017	.2675	.2675	.2675	.2675	

CenterPoint Energy has still not made a move regarding its stake in Enable Midstream Partners. CenterPoint is concerned that the value of its stake in the midstream natural gas master limited partnership fluctuates along with changes in gas and oil prices that affect producers' demand for Enable's services. So, the company tried to sell its stake in Enable in a deal that would not create a large tax liability, but was unable to reach an agreement. Selling its stake gradually is still an option. CenterPoint will work with Enable's management to reduce Enable's exposure to commodity prices. Our estimates and projections are based on CenterPoint's current ownership interest in Enable.

A gas rate case is pending in Minne-sota. CenterPoint filed for a tariff increase of \$56.2 million, based on a return of 10% on a common-equity ratio of 52.2%. An interim increase of §47.8 million took effect on October 1st. The timing of the final order is to be determined.

CenterPoint's other utilities are receiving rate relief through traditional rate cases, regulatory mechanisms, or formula rate plans. In 2017, Houston

Electric was granted \$49.6 million through two mechanisms. Two gas rate cases in Texas brought in \$17.6 million. Other revenue increases throughout CenterPoint's gas system amounted to \$53.9 million. Additional rate relief is likely in 2018.

Rate relief is helping CenterPoint's bottom line. We are estimating flat earnings in 2018 because mark-to-market accounting gains lifted share net by \$0.10 in the first three quarters of 2017. We include these in our earnings presentation because they are an ongoing part of CenterPoint's results.

We expect a dividend increase at the board meeting in January. We think the directors will boost the quarterly payout by a cent a share (3.7%), the same increase as in each of the past three years. We wouldn't rule out a slightly greater hike, however.

Timely CenterPoint stock has a dividend yield that is slightly above the utility average. However, with the recent quotation near the upper end of our 3- to 5-year Target Price Range, total return potential is about zero.

Paul E. Debbas, CFA December 15, 2017

(A) Pro forma data. (B) Diluted EPS. Excl. extraordinary gains (losses): '04, (\$2.72); '05, 9¢; '11, \$1.89; '12, (38¢) net; '13, (52¢); '15, (\$2.69); losses on disc. ops.: '04, 37¢; '05, 1¢.

'16 EPS don't sum due to rounding. Next earnings report due late Feb. **(C)** Div'ds historically paid in early Mar., June, Sept. & Dec. ■ Div'd 10%; (gas): 9.45%-11.25%; earned on avg. reinvestment plan avail. (D) Incl. intang. In '16: com. eq., '16: 12.4%%. Regulat. Climate: Avg. © 2017 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Company's Financial Strength Stock's Price Stability B+ 90 Price Growth Persistence 45 **Earnings Predictability** 75

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	Exhibit 9																	
AVANGRID, INC.	NYSE	E-AGR		R	ECENT RICE	45.8	3 P/E RATI	o 20.	2 (Traili	ng: 21.3 an: NMF	RELATIV P/E RATI	6 1.0	5 DIV'D	3.8	8%	/ALUI LINE		
TIMELINESS 3 Lowered 1/26/18									High:	38.9	46.7	53.5	50.9			Target	Price	Range
SAFETY 2 Raised 2/17/17	LEGE	NDS		\vdash					Low:	32.4	35.4	37.4	45.2			2021	2022	2023
TECHNICAL 1 Raised 1/5/18	Options:	telative Price	ce Strength															⊥80
BETA .35 (1.00 = Market)	Shaded	d area indic	cates recess	sion														60
2021-23 PROJECTIONS	-										101	11111111111111111111111111111111111111	•					 50
Ann'l Total												111111	_					40
Price Gain Return High 50 (+10%) 6%																		$\frac{+30}{25}$
High 50 (+10%) 6% Low 35 (-25%) -2%																		20
Insider Decisions											• • •							15
A M J J A S O N D to Buy 0 0 1 1 1 1 1 1 2											• • • • • • • • • • • • • • • • • • • •		•					10
Options 0 0 0 0 0 0 0 1 0																		T _{7.5}
Institutional Decisions	-														% TO	T. RETUR		_ /··3
1Q2017 2Q2017 3Q2017	Percer	nt 9 -														STOCK	/L ARITH.* INDEX	L
to Buy 121 119 104 to Sell 80 96 95	shares	6 -									l	l.			1 yr. 3 yr.	30.3	17.3 38.0	F
Hid's(000) 43670 42981 44774	traded	3 -										Hundli			5 yr.	_	85.6	
AVANGRID, Inc. was formed			2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	© VAL	UE LINE P	UB. LLC	21-23
merger between Iberdrola U										14.14	19.48	19.10	19.60	20.40		es per sh		22.75
UIL Holdings Corporation in										3.44	4.74	4.90	5.20	5.50		low" per		6.50
2015. Iberdrola S.A., a world										1.05	1.98	2.15	2.30	2.45		s per sh		3.00
the energy industry, own AVANGRID. The predecessor										3.50	1.73 5.52	1.73 7.10	1.76 6.45	1.80 5.85		cl'd per s ending p		1.95 5.75
founded in 1852 and is hea									::	48.74	48.90	49.30	49.90	50.55		ilue per si		53.25
New Gloucester, Maine. It was										308.86	308.99	309.00	309.00	309.00		n Shs Out		309.00
in 1997 in New York under the										33.5	20.5	21.2		ures are		'I P/E Rat	_	14.5
Resources, Inc. AVANGRID										1.69	1.08	1.05		Line	Relative	P/E Ratio)	.80
on the NYSE on December 17	7, 2015.										4.3%	3.8%	estin	iates	Avg Anr	'l Div'd Y	ield	4.5%
CAPITAL STRUCTURE as of 9/30									4594.0	4367.0	6018.0	5900	6050	6300	Revenue	es (\$mill)		7050
Total Debt \$5765 mill. Due in 5 \									424.0	267.0	611.0	660	720	765	Net Prof	. ,		895
LT Debt \$4767 mill. LT Interes Incl. \$104 mill. capitalized leases.	St \$233 II	niii.							39.9%	11.3%	37.4%	30.5%	21.0%	21.0%	Income			21.0%
(LT interest earned: 4.5x)									6.8%	12.7%	7.5%	7.0%	7.0%	6.0%		% to Net F		6.0%
Leases, Uncapitalized Annual ren	itals \$106	6 mill.							16.8%	23.1%	23.0%	24.0%	26.0%			rm Debt F		26.5%
Pension Assets-12/16 \$2672 mill.									83.2% 14956	76.9% 19583	77.0% 19619	76.0% 20075	74.0% 20775	75.0% 20775		n Equity F pital (\$mi		73.5% 22300
	Oblig \$3	448 mill.							17099	20711	21548	22900	24000		Net Plan		"/	27100
Pfd Stock None									3.7%	2.1%	3.8%	4.0%	4.0%	4.5%		n Total C	ap'l	4.5%
Common Stock 309,005,272 shs.									3.4%	1.8%	4.0%	4.5%	4.5%	5.0%	1	n Shr. Eq	•	5.5%
as of 11/1/17									3.4%	1.8%	4.0%	4.5%	4.5%	5.0%	Return c	n Com E	quity E	5.5%
MARKET CAP: \$14 billion (Large	Cap)								3.4%	1.8%	1.4%	1.0%	1.0%	1.5%		to Com		2.0%
ELECTRIC OPERATING STATIST		0040									66%	81%	76%	73%	All Div'd	s to Net F	Prof	67%
% Change Retail Sales (KWH) 2014 NA	2015 NA	2016 NA				, Inc., fo						lass not						
Avg. Indust. Use (MWH) / NA	NA	NA				tility comp						1% of rev						
Avg. Indust. Revs. per KWH (¢) Capacity at Peak (Mw) NA NA	NA NA	NA NA				ork, Conr York, C						of stock. z Galan.						
Peak Load, Summer (Mw) NA Annual Load Factor (%) NA	NA NA	NA NA				ted gener						ddress: 1						
% Change Customers (yr-end)	NA	+.5				s of capa						ne: 207-6						
	183	415	One	of A	VANC	RID's	s util	ities	recei	ved	stora	age a	nd tr	adin	g bus	iness	es. T	hese
Fixed Charge Cov. (%) 347 ANNUAL RATES Past Past		415 d '14-'16	a ra	ate in	icrea	se at	the	start	of 2	018.	have	been	in th	e red	for a	while	e, and	d the
of change (per sh) 10 Yrs. 5 Yr		21-'23	The			ıt reg						any e						
Revenues		NMF	settl	ement	for	South	ern C	Connec	cticut	Gas	share	e in 2	2017.	We :	have	inclu	<i>ded</i> t	hese

NMF NMF NMF ≺evenues 'Cash Flow' Earnings Dividends **Book Value**

Cal-	QUAR	TERLY RE	QUARTERLY REVENUES (\$ mill.)					
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year			
2015	1227	939	1048	1153	4367.0			
2016	1670	1439	1418	1491	6018.0			
2017	1758	1331	1341	1470	5900			
2018	1800	1375	1375	1500	6050			
2019	1875	1425	1425	1575	6300			
Cal-	EA	RNINGS F	ER SHARI	Α	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year			
2015	.42	.04	.22	.37	1.05			
2016	.63	.33	.35	.67	1.98			
2017	.77	.39	.32	.67	2.15			
2018	.85	.40	.35	.70	2.30			
2019	.90	.40	.40	.75	2.45			
Cal-	QUAR	TERLY DIV	IDENDS P	AID B ■	Full			
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year			
2014								
2015								
2016		.432	.432	.432	1.30			
2017	.432	.432	.432	.432	1.73			
2018	.432							

calling for tariff hikes totaling \$11 million through the end of 2020. The order was based on a return of 9.25% on a commonequity ratio of 52%. Also, revenues and

volume are now decoupled. Rate relief should enable the compa-

ny's earnings to increase in 2018 and **2019.** Southern Connecticut Gas isn't the only utility in the state that is benefiting from rate increases. United Illuminating's electric tariffs rose at the start of the new year, and will climb again at the start of 2019. AVANGRID's two utilities in New York will get rate hikes this year and next, on May 1st. But the company's regulated business is not the only source of profit growth. Its renewable-energy segment is adding wind and solar projects. What's more, this operation is approaching its goal of getting 75%-85% of its income from projects whose output is either contracted or hedged. This provides more stability than merchant (i.e., noncontracted) power. AVANGRID has decided to sell its gaslosses in our earnings presentation. The company has announced the sale of the trading operation for \$64.5 million in cash. The sale is expected to close on March 1st. We expect a dividend increase this year. AVANGRID has stated its "commitment" to hike the disbursement in 2018. We look for a small boost because the payout ratio is high, even by utility standards. The balance sheet is solid. AVANGRID has the highest common-equity ratio of any company in this industry. Its Financial Strength rating is B++

This stock was one of the top performers among utility issues in 2017. The stock price soared 34%. We attribute this outperformance to takeover speculation. Like most utility equities, the quotation has retreated in 2018. The dividend yield is only about average for a utility, and with the recent price well within our 2021-2023 Target Price Range, total return potential is low.

Paul E. Debbas, CFA

February 16, 2018

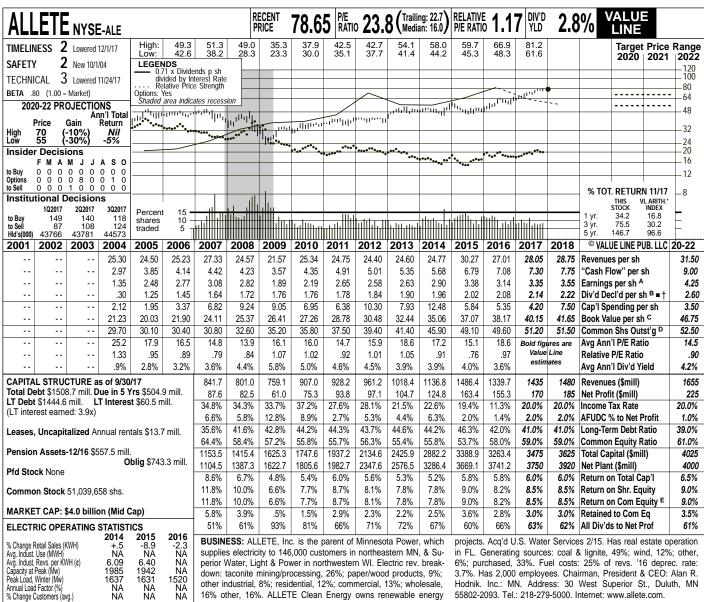
(A) Diluted EPS. Excl. nonrecurring gain: '16, intangibles. In '16: \$6.8 bill., \$21.86/sh. (D) In 66. Next earnings report due late Feb. (B) millions. (E) Rate base: net original cost. Rate Div'ds paid in early Jan., April, July, and Oct. allowed on com. eq. in NY in '16: 9.0%; in CT Dividend reinvestment plan available. (C) Incl. in '17: 9.1% elec.; in CT in '16: 9.36% gas; in

Company's Financial Strength Stock's Price Stability Price Growth Persistence **Earnings Predictability**

90 NMF NMF

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Exhibit 9



other industrial, 8%; residential, 12%; commercial, 13%; wholesale, 16% other, 16%. ALLETE Clean Energy owns renewable energy Hodnik. Inc.: MN. Address: 30 West Superior St., Duluth, MN 55802-2093. Tel.: 218-279-5000. Internet: www.allete.com

345 381 318 Fixed Charge Cov. (%) **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) 10 Yrs. to '20-'22 Revenues 1.0% 2.5% 2.5% 'Cash Flow' 6.0% 3.5% 7.5% 9.0% 7.0% 5.5% 5.0% Earnings 2.5% 6.0% 4.0% 5.5% **Book Value**

% Change Customers (avg.)

ÑΑ

ΝA

QUARTERLY REVENUES (\$ mill.) endar Mar.31 Jun. 30 Sep. 30 Dec. 31 2014 296.5 288.9 1136.8 260.7 290.7 2015 320.0 323.3 462 5 380.6 1486 4 2016 333.8 314.8 349.6 3415 1339.7 2017 365.6 353.3 362.5 353.6 1435 2018 370 360 390 360 1480 EARNINGS PER SHARE A Cal Full Mar.31 Jun. 30 Sep. 30 Dec. 31 endar Year 2014 .80 .40 .97 .732.90 2015 .83 .85 46 1.23 3.38 .93 .50 3.14 2016 .81 .89 97 .72 .78 3.35 2017 88 3.55 1.00 2018 .65 1.00 .90 QUARTERLY DIVIDENDS PAID B = † Cal-Mar.31 Jun.30 Sep.30 Dec.31 Year endar 2013 .475 .475 .475 .475 1.90 2014 49 49 49 49 1.96 2015 .505 .505 .505 .505 2.02 2016 52 52 .52 52 2.08 2017 .535 .535 .535 .535

ALLETE's largest utility subsidiary has received a recommended decision in its general rate case. Minnesota Power is seeking an increase of \$49 million (7.7%), based on a 10.25% return on a 53.8% common-equity ratio. An interim increase of \$32 million is already in place. An administrative law judge (in his first rate case hearing) recommended an ROE of just 8.7%, but this doesn't necessarily mean the final order will allow an ROE nearly that low. The company expects final tariffs to be implemented in the third quarter of 2018.

We estimate that earnings will improve this year and next. ALLETE is benefiting from the interim rate hike at Minnesota Power and a \$2.5 million increase at Superior Water, Light & Power in Wisconsin, which took effect in August. Minnesota Power also receives a current return on certain kinds of capital spending, such as a transmission line it is building between its system and that of Manitoba Hydro. The project (an estimated investment of \$330 million) is scheduled for completion in 2020. The industrial sector in the utility's service area is recovering,

with the taconite mines running at full capacity. (Taconite is used in steelmaking.) Our 2017 earnings estimate is within AL-LETE's guidance of \$3.15-\$3.40 a share.

ALLETE Clean Energy is expanding. This subsidiary has a wind portfolio of 537 megawatts in operation. Completion of a project (subject to regulatory approval) would raise this to 640 mw. ALLETE is also spending \$80 million to refurbish turbines at existing facilities.

We expect a dividend increase at the board meeting in January. This is the company's usual practice. We estimate that the quarterly disbursement will be raised two cents a share (3.7%). ALLETE is targeting a payout ratio in a range of 60%-65%.

This timely stock has performed well in 2017. The share price has risen more than 20%. We think this partly reflects takeover speculation. Some other mid-cap utilities have been acquired in recent years. We advise against purchasing the stock with the hope of a buyout. We also note that the recent quotation is above our 2020-2022 Target Price Range.

Paul E. Debbas, CFA December 15, 2017

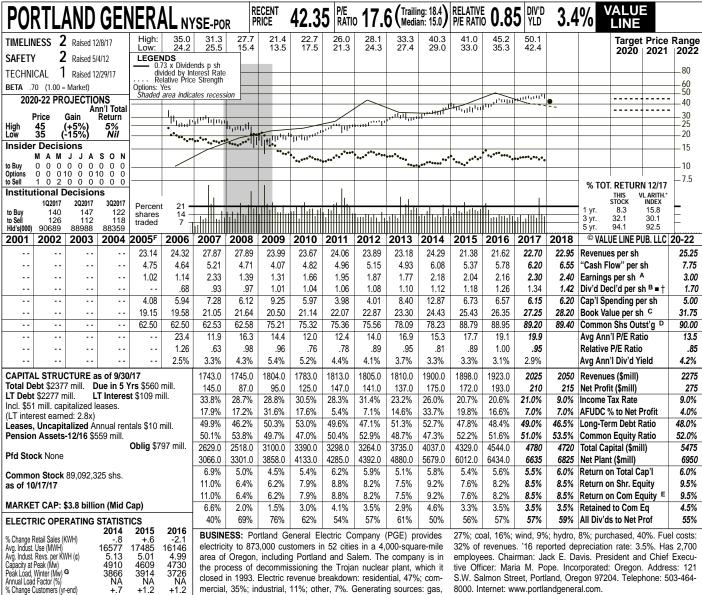
(A) Diluted EPS. Excl. nonrec. losses: '04, 25¢ net; '05, \$1.84; '15, 46¢; gain (losses) on disc. ops.: '04, \$2.57, '05, (16¢); '06, (2¢). '15 & '16 EPS don't sum due to rounding. Next earnings report due mid-Feb. (B) Div'ds historically paid in early Mar., June, Sept. and Dec. ■ Div'd reinvestment plan avail. † Shareholder invest-

'16: \$11.55/sh. (D) In mill. (E) Rate base: Orig. cost deprec. Rate allowed on com. eq. in '10: 10.38%; earned on avg. com. eq., '16: 8.3%. ment plan avail. (C) Incl. deferred charges. In Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability A 95 Price Growth Persistence 40 **Earnings Predictability** 85

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the process of decommissioning the Trojan nuclear plant, which it closed in 1993. Electric revenue breakdown: residential, 47%; commercial, 35%; industrial, 11%; other, 7%. Generating sources: gas,

tive Officer: Maria M. Pope. Incorporated: Oregon. Address: 121 S.W. Salmon Street, Portland, Oregon 97204. Telephone: 503-464-8000. Internet: www.portlandgeneral.com

243 271 Fixed Charge Cov. (%) 248 **ANNUAL RATES** Past Est'd '14-'16 of change (per sh) 10 Yrs. 5 Yrs. to '20-'22 Revenues -.5% -1.5% 2.0% 4.5% 5.5% 3.0% Cash Flow" 2.0% 7.0% Earnings 6.0% 13.5% 3.0% 6.0% 4.0% Dividends 3.5% Book Value

% Change Customers (yr-end)

+1.2

+1.2

Cal-	QUAR	TERLY RE	VENUES (\$ mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	493	423	484	500	1900
2015	473	450	476	499	1898
2016	487	428	484	524	1923
2017	530	449	515	531	2025
2018	540	455	515	540	2050
Cal-	EA	RNINGS F	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.73	.43	.47	.55	2.18
2015	.62	.44	.40	.57	2.04
2016	.68	.42	.38	.68	2.16
2017	.82	.36	.44	.68	2.30
2018	.83	.45	.44	.68	2.40
Cal-	QUART	ERLY DIVI	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.275	.275	.28	.28	1.11
2015	.28	.28	.30	.30	1.16
2016	.30	.30	.32	.32	1.24
2017	.32	.32	.34	.34	1.32
2018	.34				

Portland General Electric's rates were increased at the start of 2018. Tariffs rose \$15.9 million (0.9%), based on a return of 9.5% on a common-equity ratio of 50%. PGE had filed for an increase of \$99.9 million. The rate hike should help boost earnings this year. PGE won't provide earnings guidance for the new year until the company reports earnings in Feb-

We have raised our 2017 earnings estimate by \$0.05 a share, to \$2.30. This is because third-quarter profits were somewhat above our expectation. Our revised estimate remains within management's targeted range of \$2.20-\$2.35 a share.

forecast modest bottom-line growth in 2018. The aforementioned rate increase should help. Also, the utility's service area is experiencing slight growth in demand, even after the effects of energy efficiency measures. We have fine-tuned our estimate by raising it by a nickel a share, to \$2.40.

Litigation regarding the Carty gasfired plant is ongoing. In December of 2015, while the plant was under construction, PGE declared the contractor of the

project in default of the construction agreement. Carty cost \$637 million, but only \$514 million of these costs is reflected in rates. The company has filed suit against the contractor's insurers, intending to collect a performance bond of \$145.6 million, plus damages. PGE believes re-solving this matter will take two to four years. Meanwhile, the unrecovered Carty costs (such as depreciation) are causing a drag of \$0.09-\$0.10 a share on annual income.

This timely stock has a dividend yield that is about average for a utility. However, the recent quotation is near the upper end of our 2020-2022 Target Price Range, making 3- to 5-year total return potential low, despite the company's good dividend growth prospects. We continue to believe some takeover speculation is re-flected in the price of PGE stock, given that several mid-cap electric companies have been acquired (or involved in pending deals) in recent years. However, we do not advise investors to buy this stock with the hope that PGE will receive a takeover offer.

Paul E. Debbas, CFA January 26, 2018

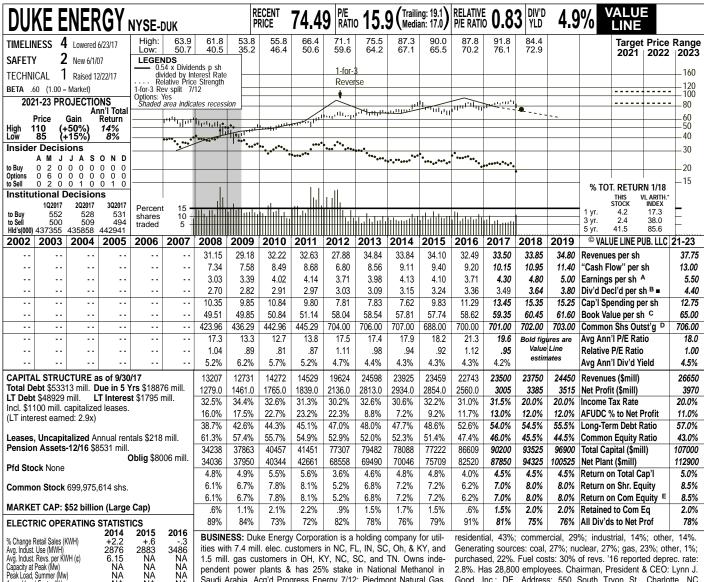
(A) Diluted EPS. Excl. nonrecurring loss: '13, 42¢. '15 EPS don't sum due to rounding. Next earnings report due mid-Feb. (B) Div'ds paid mid-Jan., Apr., July, and Oct. ■ Div'd reinvest-

ment plan avail. † Shareholder investment plan avail. (C) Incl. deferred chgs. In '16: \$5.60/sh. Average. (F) '05 per-share data are pro forma, (D) In mill. (E) Rate base: Net orig. cost. Rate based on shs. outstanding when stock began allowed on com. eq. in '18: 9.5%; earned on trading in '06. (G) Summer peak in '15 & '16.

Company's Financial Strength Stock's Price Stability B++ 95 Price Growth Persistence 65 **Earnings Predictability** 80

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Exhibit 9



pendent power plants & has 25% stake in National Methanol in Saudi Arabia. Acq'd Progress Energy 7/12; Piedmont Natural Gas 10/16; discontinued most int'l ops. in '16. Elec. rev. breakdown:

2.8%. Has 28,800 employees. Chairman, President & CEO: Lynn J. Good. Inc.: DE. Address: 550 South Tryon St., Charlotte, NC 28202-1803. Tel.: 704-382-3853. Internet: www.duke-energy.com.

315 317 264 Fixed Charge Cov. (%) ANNUAL RATES Past Past Est'd '14-'16 of change (per sh) to '21-'23 3.0% 1.5% 3.5% 1.5% 2.5% .5% Revenues 1.5% 'Cash Flow' 5.0% 4.5% Earnings 2.5% 3.0% 4.5% 1.5% Dividends Book Value - 5%

+1.0

% Change Customers (avg.)

NA

+1.2

NA

+1.4

Cal-	QUAR	TERLY RE	VENUES (\$ mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	6065	5589	6483	5322	23459
2016	5377	5213	6576	5577	22743
2017	5729	5555	6482	5734	23500
2018	5750	5600	6600	5800	23750
2019	5900	5700	6950	5900	24450
Cal-	EA	RNINGS P	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2015	1.09	.87	1.44	.70	4.10
2016	.83	.90	1.44	.53	3.71
2017	1.02	.98	1.36	.94	4.30
2018	1.05	1.05	1.65	1.05	4.80
2019	1.10	1.10	1.70	1.10	5.00
Cal-	QUART	TERLY DIV	IDENDS PA	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2014	.78	.78	.795	.795	3.15
2015	.795	.795	.825	.825	3.24
2016	.825	.825	.855	.855	3.36
2017	.855	.855	.89	.89	3.49
2018					

One of Duke Energy's utilities has reached a partial settlement of its rate case. Duke Energy Progress filed for an increase of \$477 million (14.9%), based on a 10.75% return on a 53% commonequity ratio. The settlement with the staff of the North Carolina Utilities Commission (NCUC) would provide for a hike (before the pass-through of reduced federal income taxes) of \$127 million (4.0%), based on a return of 9.9% on a common-equity ratio of 52%. The treatment of deferred costs associated with storms and coal ash basin remediation has not been resolved, so far.

Other rate cases are pending. Energy Carolinas asked the NCUC for an increase of \$647 million (13.6%), based on a 10.75% return on a 53% common-equity ratio. New tariffs should take effect in the second quarter. Duke asked the Kentucky commission for a boost of \$48.6 million (15%), based on a 10.3% return on a 49% common-equity ratio. New rates are likely to take effect in April.

We estimate a sharp earnings increase in 2018, followed by a more moderate rise in 2019. Last year, the

third-period tally was weakened by unfavorable weather conditions, an \$0.08-ashare write-off of a nonregulated windfarm, and a \$0.12-a-share charge for the cancelation of a nuclear project that was under consideration in Florida. Rate relief should be a positive factor for the bottom line each year. All told, we estimate share earnings of \$4.80 this year and \$5.00 in 2019.

Some significant capital projects are under way. Duke is building gas-fired plants in South Carolina and Florida and modernizing the electric system in Indiana and the western Carolinas. This will expand the company's rate base, and thus, pand its gas pipeline infrastructure. The company's goal for average annual profit growth is 4%-6%. its earning power. Duke also intends to ex-

This stock is ranked unfavorably for Timeliness, but offers a dividend yield that is well above the utility average. The yield is about a percentage point above the norm for this industry. Total return potential over the 3- to 5-year period is attractive.

Paul E. Debbas, CFA February 16, 2018

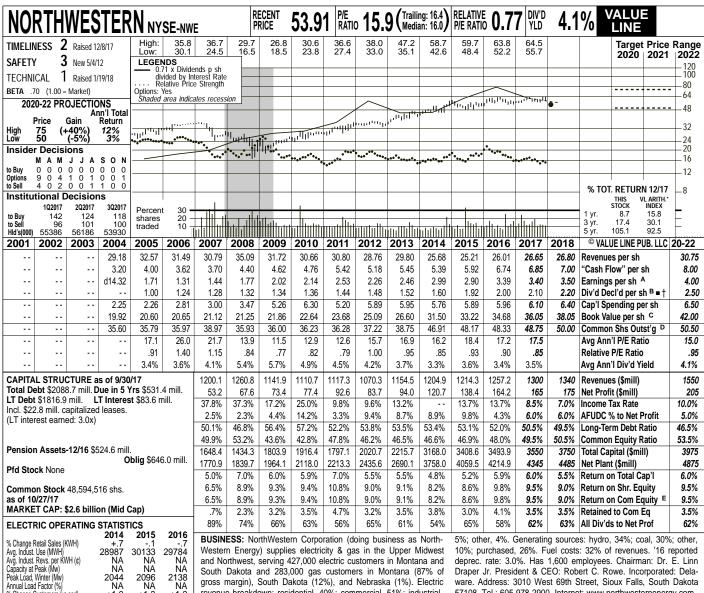
(A) Dil. EPS. Excl. nonrec. losses: '12, 70¢; '13, 24¢; '14, 67¢; gains (losses) on disc. ops.: '12, 6¢; '13, 2¢; '14, (80¢); '15, 5¢; '16, (60¢). '16 EPS don't sum due to rounding. Next egs.

report due early May. **(B)** Div'ds paid mid-Mar., Rates all'd on com. eq. in '13 in NC: 10.2%; in June, Sept., & Dec. ■ Div'd reinv. plan avail. '17 in SC: 10.1%; in '09 in OH: 10.63%; in '04 **(C)** Incl. intang. In '16: \$46.17/sh. **(D)** In mill., in IN: 10.3%; earn. on avg. com. eq. '16: 6.3%. adj. for rev. split. (E) Rate base: Net orig. cost. Reg. Clim.: NC Avg.; SC, OH, IN Above Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 40 **Earnings Predictability** 85

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Exhibit 9



South Dakota and 283,000 gas customers in Montana (87% of gross margin), South Dakota (12%), and Nebraska (1%). Electric revenue breakdown: residential, 40%; commercial, 51%; industrial,

Draper Jr. President & CEO: Robert C. Rowe. Incorporated: Delaware. Address: 3010 West 69th Street, Sioux Falls, South Dakota 57108. Tel.: 605-978-2900. Internet: www.northwesternenergy.com.

217 252 253 Fixed Charge Cov. (%) **ANNUAL RATES** Past Past Est'd '14-'16 of change (per sh) to '20-'22 Revenues -2.0% -4.0% 3.0% 'Cash Flow' 4.0% 7.0% 5.5% 5.0% 4.5% Earnings Dividends Book Value 6.0% 8.0% 5.0% 4.0%

% Change Customers (vr-end)

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+1.0

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+1.2

+1.3

Cal- endar	QUAR Mar.31		VENUES (\$ mill.) Dec.31	Full Year
2014 2015	369.7 346.0	270.3 270.6	251.9 272.7	313.0 325.0	1204.9 1214.3
2016 2017 2018	332.5 367.3 370	293.1 283.9 305	301.0 309.9 320	330.6 338.9 345	1257.2 1300 1340
Cal- endar			PER SHARI Sep.30		Full Year
2014 2015 2016 2017	1.17 1.09 .82 1.17	.20 .38 .73 .44	.77 .51 .92 .75	.85 .93 .92 1.04	2.99 2.90 3.39 3.40
Cal- endar	1.15 QUART Mar.31		.80 DENDS PA Sep.30	1.10 ID B = † Dec.31	3.50 Full Year
2014 2015 2016 2017 2018	.40 .48 .50 .525	.40 .48 .50 .525	.40 .48 .50 .525	.40 .48 .50 .525	1.60 1.92 2.00 2.10

We estimate a modest earnings in**crease for NorthWestern this year.** The company will benefit from a full year's effect of a \$5.1 million gas rate increase that took effect in Montana at the start of September. Otherwise, there is not much impetus for anything better than low single-digit profit growth. We look for a 3% increase over our \$3.40-a-share estimate for 2017, which is within NorthWestern's targeted range of \$3.30-\$3.45 a share.

NorthWestern is making some financ**ing moves.** In the fourth quarter of 2017, the company sold \$250 million of 30-year bonds to redeem an equal amount of debt that was due in 2019. This will reduce annual interest expense by over \$5 million. NorthWestern has also initiated a \$100 million at-the-market stock offering program. It sold \$5 million worth of equity in the third period of 2017, and expects to issue the remaining \$95 million through the end of 2018.

Two legal matters might be resolved this year. The company is appealing an unfavorable ruling from the Federal Energy Regulatory Commission (FERC) to the U.S. Circuit Court of Appeals. FERC had

ruled that just 4% of the cost of a gas-fired plant could be allocated to wholesale customers, versus the 20% NorthWestern had requested. This forced the company to take a \$0.12-a-share charge in 2012. A ruling might come as early as the current quarter. The utility is appealing an order from the Montana commission to the state courts. The regulators' disallowance of some costs forced NorthWestern to take a \$0.13-a-share charge in the March quarter of 2016. A decision is likely this year. Note that each of these charges is *included* in our earnings presentation.

We expect a dividend hike in the current quarter. We estimate that the board of directors will boost the annual disbursement by \$0.10 a share (4.8%), the same increase as in 2017. We project similar dividend growth through the early part of the next decade.

The dividend yield of this timely stock is slightly above the utility mean. Total return potential to 2020-2022 is a cut above the industry average. Like most utility equities, the recent price is within our 3- to 5-year Target Price Range. Paul E. Debbas, CFA January 26, 2018

(A) Diluted EPS. Excl. gain (loss) on disc. ops.: '05, (6¢); '06, 1¢; nonrec. gains: '12, 39¢ net; '15, 27¢. '15 EPS don't add due to rounding.

historically paid in late Mar., June, Sept. & Dec.

Div'd reinvest. plan avail. † Shareholder invest. plan avail. (C) Incl. def'd charges. In '16: none specified, in NE in '07: 10.4%; earned on Next earnings report due mid-Feb. (B) Div'ds | \$19.87/sh. (D) In mill. (E) Rate base: Net orig. | avg. com. eq., '16: 10.1%. Regul. Climate: Avg. © 2018 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Company's Financial Strength Stock's Price Stability B+ 95 Price Growth Persistence 85 **Earnings Predictability** 85

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ATTACHMENT B

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ENERGY REGULATORY COMMISSION

In the Matter of:

DOCKET NUMBERS

ER89-678-000 EL90-16-000 EL90-45-000

SYSTEM ENERGY RESOURCES, INC.

DEPOSITION OF GLENN E. HARDER

Jackson, Mississippi Monday and Tuesday April 29 & 30, 1991

Deposition of Glenn E. Harder, called for examination pursuant to notice of deposition at the law offices of Wise Carter Child & Caraway, Sixth Floor Heritage Building, Jackson, Mississippi, before Polly J. Pinson, Court Reporter and Notary Public, State of Mississippi, when were present on behalf of the respective parties:

ROBERT S. WATERS, ESQ. WILLIAM M. DUDLEY, ESQ. Reid & Priest 701 Pennsylvania Avenue, N.W. Washington, D. C. 20004 On behalf of System Energy Resources, Inc.

---continued---

THE FREE LANCE REPORTER Post Office Box 22764 Jackson, Mississippi 39225-2764



return on costs incurred to finance the capital expenditures of the plant using means other than common equity.

- Q. Is the SERI tariff sometimes referred to as the cost of service tariff?
 - A. I think it could be referred to that way.
- Q. Is it sometimes referred to as a formula rate?
 - A. Yes, sometimes.

- Q. Does the SERI tariff allow for the automatic pass through of all the costs that are incurred on a monthly basis relating to the operation of Grand Gulf?
- A. The costs that are properly includable in the operating accounts would be passed through.
- Q. Is that a different sort of an arrangement from traditional rate making?
- A. I think it's probably a permissible alternative to a test period based rate that probably you would view as the traditional alternative.
- Q. What justifications in your view exist for the use of the cost of service tariff as opposed to the more traditional test period rate making?
- A. Well, I believe due to the unique nature of the Grand Gulf unit, being the sole asset of System Energy, it enables the company to on a timely basis

pay their bills that perhaps could not be paid if a traditional test period base rate was implemented, because in a traditional test period base rate structure the cost of service is allocated out to customers on a cents per kilowatt hour basis. And with Grand Gulf being System Energy's sole revenue source, there are periods of time when it's down for refueling outages and maybe at times for unanticipated outages where there would be no ability to bill cost of service should a test period based rate structure be used.

The formula method or the unit power sales agreement method also is of benefit to customers because the ability to finance is enhanced, I believe, with the unit power sales agreement structure in that lenders are, at least to a degree of comfort, higher than they would have should System Energy use a test period base rate structure, can rely on the fact that the bills will be sent out and costs incurred will in fact be paid on a monthly basis to the extent they're prudent costs. That is of benefit in access to capital markets, probably has resulted in us being able to finance in times when otherwise we probably would not have been able to finance and does produce some cost of money benefit, I would presume.

- Q. Are there any other benefits?
- A. There probably are others that I can't think of right now, but those are certainly two major benefits.
- Q. Are you familiar with the justification that even though the company gets an automatic recovery of additional higher costs, that the ratepayer gets the automatic pass through of lower costs on a timely basis?
 - A. Could you repeat that, please?
- Q. Well, the justification that the FERC used that it can go up and it can go down, and it allows the ratepayer to get--are you aware of that one?
- A. I'm not sure I'm aware of where that was used, but it certainly is a feature of the formula rate.
- Q. What is it? Would you say it so I'll have your description of it?
- A. Well, I presume you're talking about operating and maintenance costs in particular, which would mean that should there be economies achieved or better ways found out to do certain ongoing activities that cost less, that benefit would be reflected in System Energy's accounts and under the unit power sales agreement would be reflected in the O & M cost

billed for Grand Gulf.

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- Q. Does the cost of service tariff by the fact that ratepayers get the benefit of economies, does it reduce incentives for the company to achieve economy?
 - A. No.
 - Q. Why do you say that?
- Α. Because there are many considerations when had to--when you evaluate what are a company's One of the reasons that I say no is that we continually are striving to be recognized as a cost efficient operation relative to other units, nuclear units in the industry and relative to the other sources of generation in our own system. We want to economical provider power. be an οf There competitive reasons the system would like to see us -all units run at lowest efficiently--lowest efficient prudent cost possible to improve the system's competitive position relative to other sources of so, I would say power any competitors may have; absolutely we are very in tune and very conscious of trying to produce the most efficient and economical costs related to producing power at Grand Gulf.
- Q. How does Grand Gulf stack up compared to other nuclear plants?
 - A. Very well.

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- Q. Can you tell me how, give me some description of it?
- A. Well, I mean, there are all types of ways when you say stack up, you can talk about in terms of regulatory performance or you can talk in terms of cost performance or you can talk in terms of safety performance. Which one in particular are you referring to?
- Q. Since we were talking about costs and cost competitiveness, and so on, that's the one I was interested in.
- Α. I think you have to look at it in features; one and the one that we track most often is how do we stack up--does Grand Gulf stack up relative to the operations and maintenance costs compared with other units in the industry. And on basic nonfuel operation and maintenance costs, Grand Gulf is--looks very well, does very well relative to the industry. Our fuel costs have been a little higher than other units in the industry, but that is coming down. we see ourselves at Grand Gulf as being--comparing very favorably with other units in the industry. goal is to be in the top quartile of cost performance in the industry.
 - Q. Are you?

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- A. We're not quite there yet, but we're close.
- Q. Do you know what the cost per kilowatt hour approximately say in 1990 or 1989, some period of time, was for electricity generated by Grand Gulf?
- the year of 1990, it was somewhere Α. For between 11 and 12 cents a kilowatt hour. This year, year to date, I would say we're probably running at nine or under cents per kilowatt hour. The reason--or let me just talk about the other way of comparing the You know, the historical capital investment costs. for Grand Gulf was a significant capital investment. So, if you track the cost--total cost billed, including a return on the capital investment and depreciation of the capital investment, Grand Gulf is costly compared to other sources of power. said, our goals are mainly over the things that we think can directly influence--the operations, we maintenance, fuel costs--by doing--making decisions on which types of services are required and which activities we undertake. So, our comparisons are--and qoals are--basically revolve around efficiently using our operating and maintenance, fuel, and ongoing additional capital expenditure budgets.
 - Q. Was there an outage in 1990?
 - A. Yes.

ATTACHMENT C



Grand Gulf Nuclear Station Power Uprate

08/01/2010

Ву



An uprate currently being planned at Entergy's Grand Gulf Nuclear Station will make it among the most powerful nuclear unit of its type in the world.

By Ann Day Becker, Communications Manager, Entergy Nuclear

In 2012, Grand Gulf Nuclear Station in Port Gibson, Miss., will earn a new distinction in the global nuclear industry when an extended power uprate (EPU) makes it among the single most powerful nuclear generating unit of its type in the world.

The upgrade will increase Grand Gulf's production by more than 13 percent, or approximately 178 MWe, bringing total (gross) output of the General Electric boiling water reactor to over 1,500 MWe.

Since the 1970s, power uprates have been a common strategy in the nuclear industry to increase the generating capacity of reactors. Because uprates affect a reactor's licensed power level, utilities must apply to the Nuclear Regulatory Commission for permission to amend their operating license for a power uprate.

According to the NRC's website, 116 uprates have been approved in the U.S. as of January 2008, resulting in a gain of approximately 15,600 MWt or 5,200 MWe at existing plants. The NRC reports that collectively, these uprates have added generating capacity to the nation's power grid equivalent to more than five new reactors. (MW thermal is a measure of the heat produced in the reactor, while MW electrical is a measure of the electricity produced by the generator.)

Grand Gulf's decision to perform the EPU has been in the works since 2003 but was put on hold when industry-wide issues surfaced with concerns about fuel failures and cracking in steam dryers. Entergy's plan was to reevaluate the uprate annually while the industry gained a better understanding of the effect of power uprates on fuel performance and steam dryer structural integrity.

"The steam dryer cracking issue is one of the primary reasons for NRC delays or rejections of EPU submittals," said Jeff Richardson, director of major projects for Entergy's nuclear fleet power uprate initiative. "The steam dryer isn't necessarily the most expensive component; the real issue is regulatory. The NRC requires that we add 100 percent margin in addition to ASME requirements to ensure that dryers are exceptionally robust and strong compared to limits and operating conditions."

Positioned in the top of the reactor vessel, the steam dryer removes moisture droplets from steam produced by the reactor before it travels to the turbines. Purifying the steam increases efficiency, reduces radioactive contamination and reduces wear and tear on turbine components.

By 2008, the industry's fuel question resolved itself with the introduction of stronger, new-generation fuel designed to withstand higher operating temperatures and pressures. However, concerns about steam dryer cracking are left up to individual plants to resolve through research and analysis to satisfy NRC requirements.

In addition to the regulatory burden, modifying or replacing a steam dryer is a time- and labor-intensive task to add to the scope of an EPU outage. A steam dryer can weigh anywhere from 40 to 60 tons. Because it is located on the nuclear side of the plant, project planners must factor in measures for limiting radiation exposure to outage workers.

Entergy refueling outages are typically scheduled for 25 to 30 days, a duration that can more than triple for outages involving EPUs and extensive equipment replacements and modifications.

Plants considering uprates have three options when it comes to the steam dryer question: They can demonstrate that the existing steam dryer will perform within required operating margins for an uprate, they can perform modifications to the steam dryer to strengthen it for increased demands or they can replace the steam dryer.

In 2008, Grand Gulf's uprate team decided to move forward with structural analysis of the steam dryer. During the fall refueling outage, strain gauges were installed on main steam lines to measure pressure and stress at multiple points. When the plant returned to power, engineers plugged operating data into a 3-D finite element analysis

model to determine if the dryer and associated piping and structural supports could perform within required ASME margins under uprate conditions.

"The model understands what happens to a component when stress and pressure are applied and subjects the model to a spectrum of forces," Richardson said. It's a sequential, iterative process that requires high-powered computers to iterate through a number of sequences in different scenarios to determine if there are problems. Engineers could build the model out to explore problem areas in more detail, which is called submodeling and takes even more time. "In all, the analysis took nearly a year to complete," Richardson said.

In parallel with data analysis and submodeling, the team proceeded with a path for replacement in case the steam dryer didn't meet the new operating criteria. By the end of 2009, data analysis pointed to replacement as the necessary option. That's when Grand Gulf committed to the EPU and began contracting for equipment and services for the uprate outage in mid-2012.

In addition to a new steam dryer, Grand Gulf will replace several major components with new models that are designed to handle higher process flow capacities and power output. They include the main generator, high-pressure turbine rotor, heat exchangers, main feedwater heaters, moisture separator reheaters and main transformers. The plant's cooling capacity will also be enhanced.

Replacing all of the equipment in a single outage is a large scope of work. "We're talking about significant components that are in some cases radioactive," Richardson said. Completing the work will require a choreography of cranes, rigging and moving major pieces of equipment. Any one of these evolutions could easily take 30 or more days and cost anywhere from \$20 million to \$30 million.

During the spring 2010 refueling outage, Grand Gulf employees conducted detailed plant walk-downs to perform laser mapping to build 3-D models of work spaces. They'll use the maps to calculate movement paths for equipment.

"The planning and design have to take every square inch into consideration," Richardson said. "Can we get X number of bodies in Y amount of square footage to get things done?" In addition to the complexity of the job, the plant must ensure safety oversight and training.

During a typical refueling outage, Grand Gulf brings in hundreds of contract workers who are required to complete a series of background checks, drug screenings, training and testing before being authorized to access the plant. For the 2012 outage, that number will surge to as much as double the typical volume, bringing with it demands on security, access control, dosimetry, training, facilities, food services and even roadways leading to the site.

"It will require everything from additional bathrooms and parking spaces to improvements to local roads to support more traffic," Richardson said.

Preparations for refueling outages always begin well in advance and that's especially the case for an EPU. Entergy created a corporate organization specifically to oversee and manage EPUs for its nuclear fleet. The centralized group mainly concentrates on contract negotiations, financial modeling and analysis and project oversight. Additionally, the site EPU team is staffed with project management, engineering and construction personnel who execute the project implementation. Their work is supplemented by around two dozen personnel directly contracted by Entergy to assist with the project.

The Shaw Group Inc. was awarded the contract for engineering, procurement and construction and has overall responsibility for the EPU with the exception of the steam dryer and turbine components.

GE Hitachi is in charge of work related to the steam dryer, including design, manufacture, delivery and installation. The company will also perform analyses and engineering studies to satisfy regulatory requirements for the uprate and will work with the Entergy team to prepare the licensing submittal for the NRC.

Siemens will perform all tasks related to high-pressure turbine and generator replacement and related upgrades or replacements of auxiliary equipment.

In addition to major contractors, dozens of smaller companies have been contracted to supply a broad range of equipment and service needs for the EPU.

The NRC isn't the only entity that must grant a stamp of approval for Grand Gulf's EPU. Entergy's customers also had to give their go-ahead to the over \$570 million project, which includes uprate and transmission grid upgrades, through a review process conducted by the Mississippi Public Service Commission in late 2009.

"We performed a careful analysis of least-cost electrical sources for customers and presented our case to the commission," Richardson said. "The additional megawatts gained from the uprate will displace other forms of higher-cost electricity and those savings will offset the capital cost of the investment."

The EPU is part of Entergy's overall plan to close a growing gap between the amount of power the company produces and the amount customers use. Grand Gulf can produce electricity more cheaply than the company can buy power from the open market.

Grand Gulf, which celebrated its 25th anniversary in July, is among the most affordable source of electricity in Mississippi, generating power at approximately 0.5 cents per kilowatt hour. This saves an estimated \$200,000 to \$600,000 a day for Entergy customers in the state, depending on the price of natural gas. More than half of the utility's power is produced using natural gas, so Grand Gulf provides much-needed fuel diversity.

The reliability of nuclear energy when compared to other fuel sources is another endorsement for power uprates. Nuclear energy is the most reliable energy source in the nation, according to a report released in May 2010 by the American Nuclear Society.

Between 2007 and 2009, Entergy's 11 nuclear plants were online producing electricity more than 90 percent of the time. Entergy's nuclear production is significant when compared to capacity factors of other forms of energy. The Nuclear Energy Institute reports that over the same three-year period, steam turbine coal plants managed a capacity factor of 70.8 percent while combined cycle natural gas plants achieved a capacity factor of 41.7 percent. Capacity factor for wind was 31.1 percent.

Increasing the use of nuclear energy to meet growing energy demands will also be a boon for the environment. During 2009, Grand Gulf Nuclear Station avoided the emission of 45,029 metric short tons of sulfur dioxide (SO2); 17,920 metric short tons of nitrogen oxide (NOX); and 9.64 million metric tons of carbon dioxide (CO2), the principal greenhouse gas, all of which would have resulted from other power sources.

"The uprate represents a major investment in Mississippi's economy and energy infrastructure," Richardson said. It's also a validation of Grand Gulf's excellent safety and operating record over the last 25 years. "We couldn't

have gotten to this point unless we had proven that we are a safe, responsible operator of nuclear plants."

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Grand Gulf goes for big uprate

14 May 2010

US utility Entergy has awarded a contract to the Shaw Group to perform modifications at its single-unit Grand Gulf nuclear power plant in Mississippi that will increase the unit's generating capacity by almost 14%.

Under the contract - worth \$197 million - Shaw will provide engineering, procurement and construction services designed to add some 178 MWe of power generation to the 1297 MWe boiling water reactor (BWR). Engineering and procurement are underway, Shaw said, with construction to follow to install plant modifications in spring 2012. The uprate would make Grand Gulf the largest-generating nuclear reactor in the USA. Currently, the plant accounts for 22.3% of Mississippi's electricity generation.



Grand Gulf (Image: NRC)

Shaw has performed more than 60 uprate projects and studies on BWRs and pressurized water reactors (PWRs), adding more than 3000 MWe to the US grid.

In April 2009, Entergy Nuclear renewed its existing contract with the Shaw for the provision of nuclear maintenance services to its fleet of eleven reactors at nine nuclear power plants. Shaw said that its scope of work includes routine maintenance and modifications, refuelling outage services and capital construction. The value of the six-year contract was not disclosed.

Entergy owns eleven nuclear units at nine plant sites, primarily in northeastern and southern USA. The eleven nuclear units include five General Electric BWRs, three Combustion Engineering PWRs, one Babcock and Wilcox PWR, and two Westinghouse PWRs.

According to the US Nuclear Regulatory Commission (NRC), which must approve changes in engineering at nuclear power plants, a survey of reactor licensees in December 2009 indicated that some 39 applications are likely to be submitted to the NRC over the next five years for power uprates totalling about 2419 MWe of new generating capacity.

Uprate options

The NRC recognises three categories of power uprates:

'Measurement uncertainty recapture' power uprates, which involve implementing enhanced techniques for calculating reactor power and can typically increase reactor capacity by up to 2%;

'Stretch' power uprates, which usually involve changes to instrumentation settings but are Since 1977, the NRC has approved a total of 129 uprate projects which together have added some 5726 MWe of generating capacity at existing plants.

Researched and written by World Nuclear News within the design capacity of the plant and can typically add up to about 7% capacity; and

'Extended' power uprates, which involve significant modifications to major plant equipment and can result in up to 20% capacity increases.

ISSN 2040-5766

ATTACHMENT D

CERTAIN RIGHTS OF THE LESSOR UNDER THIS FACILITY LEASE HAVE BEEN ASSIGNED TO, AND ARE SUBJECT TO A SECURITY INTEREST IN FAVOR OF THE INDENTURE TRUSTEE UNDER TRUST INDENTURE, DEED OF TRUST, MORTGAGE, SECURITY AGREEMENT AND ASSIGNMENT OF FACILITY LEASE NO. 2 DATED AS OF DECEMBER 1, 1988. THIS FACILITY LEASE HAS BEEN EXECUTED IN SEVERAL COUNTERPARTS. SEE SECTION 22(e) OF THIS FACILITY LEASE FOR INFORMATION CONCERNING THE RIGHTS OF HOLDERS OF VARIOUS COUNTERPARTS HEREOF.

THIS COUNTERPART IS NOT THE ORIGINAL COUNTERPART.

FACILITY LEASE NO. 2

dated as of December 1, 1988 between

MERIDIAN TRUST COMPANY

and STEPHEN M. CARTA,

not in their individual capacities, but solely as Owner Trustee under Trust Agreement No. 2, dated as of December 1, 1988, with Lease Management Realty Corporation IV,

Lessor

and

SYSTEM ENERGY RESOURCES, INC.,

Lessee

Sale and Leaseback of an Undivided Interest in Grand Gulf Nuclear Station Unit No. 1

any part thereof, or, except as provided in Section 8(f), to pay the cost of alteration, rebuilding, replacement, repair or maintenance of Unit 1, any Capital Improvement or the Plant Site, or any part thereof, and the Lessee expressly waives the right to perform any such action at the expense of the Lessor pursuant to any law at any time in effect.

- (b) Inspection. The Lessor, the Owner Participant, the Indenture Trustee, the Collateral Trust Trustee and prospective purchasers of the Undivided Interest or the beneficial interest in the Trust Estate (or their respective authorized representatives with appropriate security clearance, if necessary) shall have the right to inspect the Plant (subject, in each event, to the Plant Agreements, Applicable Law, applicable confidentiality undertakings and procedures established by the Lessee) at their expense at such times and as often as shall be reasonably requested. The Lessor, the Owner Participant and prospective purchasers of the Undivided Interest or the beneficial interest in the Trust Estate and their respective authorized representatives (with appropriate security clearance if necessary) shall have the right to inspect, at their expense, the books and records of the Lessee relating to Unit 1, and make copies of and extracts therefrom (subject as aforesaid) and may, at their expense, discuss the Lessee's affairs, finances and accounts with its executive officers, all at such times and as often as may be reasonably requested. None of the Lessor, the Owner Participant, the Indenture Trustee and the Collateral Trust Trustee shall have any duty whatsoever to make any inspection or inquiry referred to in this Section 8(b) and shall not incur any liability or obligation by reason of not making any such inspection or inquiry.
- (c) Capital Improvements. The Lessee shall, if and to the extent required of it under the Plant Agreements or Applicable Law, at its sole expense (except as provided in Section 8(f)), promptly, but subject to Section 8(a) hereof, participate in the making of any Capital Improvement to Unit 1. The Undivided Interest Percentage of the net proceeds of (x) any sale or other disposition of property removed from Unit 1 received (without deduction of any amount set off or deducted by any Person claiming a right against the Lessee to do so) by, or credited to the account of, the Lessee in accordance with the Plant Agreements and (y) any insurance proceeds received (without deduction of any amount set off or deducted by any Person claiming a right against the Lessee to do so) for the account of the Lessor or the Lessee in respect of the loss or destruction of, or damage or casualty to, any such property shall be applied as provided in Section 9(g), (h) or (i), as the case may be. The Undivided Interest Percentage in property at any time removed from Unit 1 shall remain the property of the Lessor, no matter where located, until such time as a Capital Improvement constituting a replacement of such property shall have been installed in Unit 1 or such removed property has been disposed of in accordance with the Plant Agreements. Simultaneously with such disposition, title to the Lessor's undivided interest in the removed property shall vest in the Person receiving such property, free and clear of any and all claims or rights of the Lessor. Unless paragraph (iii) of Section 8(e) shall be applicable, upon the incorporation of a Capital Improvement in Unit 1, without further act, (x) title to an undivided interest equal to the Undivided Interest Percentage in such Capital Improvement shall vest in the Lessor and (y) such undivided interest in such Capital Improvement shall become subject to this Facility Lease and be deemed to be part of the Undivided Interest for all purposes hereof to the same extent that the Lessor had a like undivided interest in the property originally incorporated or installed in Unit 1. The Lessee warrants and agrees that the Lessor's interest in all Capital Improvements shall be free and clear of all Liens, except Permitted Liens.
- (d) Reports. To the extent permissible, the Lessee shall prepare and file in a timely fashion, or, where the Lessor shall be required to file, the Lessee shall prepare or cause to be prepared and delivered to the Lessor within a reasonable time prior to the date for filing, any reports with respect to Unit 1, the Undivided Interest, the Ground Lease Property or the condition or operation thereof that shall be required to be filed with any Governmental Authority. On or before March 1 of each year (commencing March 1, 1990) and on the Lease Termination Date, the Lessee shall furnish the Lessor and the Owner Participant with a report stating the total cost of all Capital Improvements and describing separately and in reasonable

detail each Capital Improvement (or related group of Capital Improvements) made during the period from the date hereof to December 31, 1989 in the case of the first such report and during the period from the end of the period covered by the last previous report to the December 31 immediately preceding such report in the case of subsequent reports. On or before March 1 in each year (commencing March 1, 1990) and at such other times as the Lessor or the Owner Participant shall reasonably request in writing, the Lessee will report in writing to the Lessor with respect to (i) the capital expenditures contemplated by the most recent annual budget for Unit 1 and (ii) the current plans (if any) which the Lessee may have for the financing of its share (in accordance with the Plant Agreements) of the same under Section 8(f).

- (e) Title to Capital Improvements. Title to an undivided interest, equal to the Undivided Interest Percentage, in each Capital Improvement to Unit 1 shall vest as follows:
 - (i) in the case of each Nonseverable Capital Improvement, whether or not the Lessor shall have financed or provided financing (in whole or in part) for such undivided interest in such Capital Improvement by an Additional Equity Investment or a Supplemental Financing, or both, effective on the date such Capital Improvement shall have been incorporated or installed in Unit 1, the Lessor shall, without further act, acquire title to such undivided interest in such Capital Improvement;
 - (ii) in the case of each Severable Capital Improvement, if the Lessor shall have financed (by an Additional Equity Investment or a Supplemental Financing, or both) the Undivided Interest Percentage of the cost of such Capital Improvement, or if such Capital Improvement shall be required by Applicable Law or pursuant to Section 8(a)(i), 8(a)(ii) or, to the extent of compliance with Governmental Actions not significantly more onerous than those in effect on the Closing Date, 8(a)(ii), the Lessor shall, without further act, acquire title to such undivided interest in such Capital Improvement; and
 - (iii) in the case of each Severable Capital Improvement which does not constitute a Capital Improvement required to be made by Applicable Law or pursuant to Section 8(a)(i), 8(a)(ii) or, to the extent of compliance with Governmental Actions not significantly more onerous than those in effect on the Closing Date, 8(a)(iii), if the Lessor shall not have financed (by either an Additional Equity Investment or a Supplemental Financing, or both) the Undivided Interest Percentage of the cost of such Capital Improvement, the Lessee shall retain title to such undivided interest;

provided, however, that if, as a result of the foregoing, title to an undivided interest in a Severable Capital Improvement which is in replacement of any component of Unit 1 vests in the Lessor, title to an equivalent undivided interest in the replaced component shall vest in the Lessee at the time of such replacement, provided no Event of Default shall have occurred and be continuing at such time. Immediately upon title to such undivided interest in any Capital Improvement vesting in the Lessor pursuant to paragraph (i) or paragraph (ii) of this Section 8(e), such undivided interest in such Capital Improvement shall, without further act, become subject to this Facility Lease and be deemed part of the Undivided Interest and Unit 1 for all purposes hereof.

(f) Funding of the Cost of Capital Improvements. The Lessee shall give the Lessor and the Owner Participant reasonable advance notice before placing in service any Capital Improvement to Unit 1 the cost of which exceeds \$100,000,000 in the aggregate. The Owner Participant shall have the option, in its sole discretion, of financing through the Lessor the Undivided Interest Percentage of the cost of any Capital Improvement, or any other Capital Improvement presented to the Owner Participant for financing, including or not including the making of an investment by the Owner Participant (an "Additional Equity Investment") and the issuance of one or more Additional Notes, all on terms acceptable to the Lessee and the Owner Participant. In the case of any Capital Improvement whose cost is to be incurred during the last five years of the Basic Lease Term, if the Lessee shall not have given the notice specified in clause (ii) of Sec-

ATTACHMENT E

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

LOUISIANA PUBLIC SERVICE	*		
COMMISSION	*		
	*		
VERSUS	*	DOCKET NO. EL18-	
	*		
SYSTEM ENERGY RESOURCES,	*		
INC., and	*		
ENTERGY SERVICES, INC.	*		
* * * * * * * * * * * * * * * * * * * *	*		

NOTICE OF COMPLAINT

April ___, 2018

Take notice that on April 27, 2018, pursuant to section 206, 306 and 309 of the Federal Power Act and Rule 206 of the Commission's Rules of Practice and Procedure, the Louisiana Public Service Commission filed a formal complaint against System Energy Resources, Inc. and Entergy Services, Inc. The complaint alleges that System Energy's return on equity is unjustly and unreasonably excessive, its capital structure is unjustly and unreasonably rich with equity, and its depreciation rates are excessive.

The Complainant certifies that copies of the Complaint were served on contacts for Respondents.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. The Respondent's answer and all interventions, or protests must be filed on or before the comment date. The Respondent's answer, motions to intervene, and protests must be served on the Complainants.

The Commission encourages electric submission of protests and interventions in lieu of paper using the "eFiling" link at http://www.ferc.gov. Persons unable to file electronically should submit an original and 5 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426.

This filing is accessible on-line at http://www.ferc.gov , using the "eLibra"	ary"
link and is available for review in the Commission's Public Reference Room	in
Washington, DC. There is an "eSubscription" link on the web site that enables subscrib	bers
to receive email notification when a document is added to a subscribed docket(s).	For
assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov	, or
call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.	

Comment Date:	, 2018
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Kimberly D. Bose, Secretary.